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RESPONSE TO COMMENTS

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RESPONSE TO COMMENTS

1. Introduction

Purpose of the Final Environmental Impact Report

This report has been prepared to accompany the Draft Environmental Impact Report (DEIR) for the California Department of Parks and Recreation's (the Department's) Sugarloaf Ridge State Park (SRSP) General Plan. The General Plan provides goals and guidelines that direct future development of the park while preserving the environmental integrity of the park. DEIR provides a program-level analysis of the potential environmental impacts associated with the Preliminary General Plan. Because the goals and guidelines provide direction to future projects on how to avoid, or minimize potential impacts, the General Plan is a self-mitigating document. This Section responds to the comments on the DEIR and makes revisions to the DEIR, as necessary, in response to these comments. Together with the DEIR, this document constitutes the Final EIR for the project.

The Final EIR is an informational document prepared by the lead agency that must be considered by decision-makers before approving or denying a proposed project. The Final EIR includes changes proposed as a result of comments received and revisions by DPR staff to clarify the DEIR and/or the General Plan. This document has been prepared pursuant California Environmental Quality Act (CEQA) Guidelines (Section 15132) which specify the following:

The Final EIR shall consist of:

(a) The draft EIR with a revision of the draft.

(b) Comments received on the draft EIR either verbatim or in summary and responses to those comments.

(c) A list of persons, organizations, and public agencies commenting on the draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency.

Environmental Review Process

On December 10, 2003, the California Department of Parks and Recreation (lead agency) released the Sugarloaf Ridge State Park Preliminary General Plan and DEIR for public review (State Clearinghouse No. 2003012051). The public review and comment period on the DEIR began on December 12, 2003 and closed January 27, 2004. Following EIR certification, the Department may proceed with consideration of project development and approval actions.

2. List of Commenters

The following table includes all persons and organizations that submitted comments on the DEIR during the comment period:

Table 1. Log of Public Comments for CEQA Review

#	AFFILIATION	NAME	COMMENTS	DATE REC'D	TOPICS
1	California Native Plant Society	Lynn Houser	27	1/22/04	Biological Issues
2	Individual	Sandra Perry	5	1/26/04	Privacy, Fencing, Trails, Invasive plants, Trailhead
3	Individual	David B. Dixon	8	1/26/04	Nunns Canyon access and resource management
4	Department of Transportation	Timothy C. Sable	5	1/27/04	Traffic
5	Sonoma Ecology Center	Caitlin Cornwall	13	1/27/04	Resource Management
6	Individual	Cathryn Charette	2	1/29/04	Nunns Canyon access and resource management
7	Valley of the Moon Alliance	Del Rydman	6	1/29/04	Traffic
8	Individual	David F. Leland	29	1/29/04	Water Quality and Quantity
9	Individual	Lu Benson	2	1/29/04	Adobe Canyon Road and Sudden Oak Death Disease
10	Individuals	3 signees	3	1/29/04	Nunns Canyon access and resource management
11	Individual	Steven J Perry	12	1/29/04	Traffic
12	Individual	Jeffrey D. Knaus	6	2/26/04	Nunns Canyon access and resource management
Total	118				

As stated in CEQA Guidelines, Article 13, Section 15204: CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

3. Responses to Comments and Recommended Changes to the General Plan

This Section contains copies of comments received during the comment period and responses to those comments. Each comment is numbered in the margin of the comment letter, and the responses to all of the comments in a particular letter follow the letter. The comments are referenced numerically by letter and comment number. Where a response includes a change to the text of the DEIR, the change is often shown in the response to comment in a different typeface like that shown here. If

the change is too extensive to be shown, a reference is made to the page number which contains the corrections and clarifications that were made. Other times page numbers are listed in the response to a comment when a commenter has specifically referred to a page in the document.

4. Summary of Recommended Changes to the General Plan

Chapter 4 compiles all changes recommended in response to letters received. The changes are presented in numerical order by chapter, and the relevant comment is noted in parentheses.

5. Summary of Changes to the General Plan Recommended by Staff

There were no changes recommended by staff.

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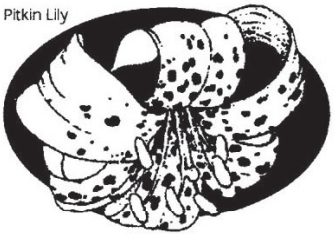
Letter I



California Native Plant Society
Milo Baker Chapter

January 19, 2004

Mr. Wayne Woodroof, Manager
Statewide General Plan Program
California Dept. of Parks and Recreation
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, California 95814

RECEIVED
JAN 2 2 2004
NORTHERN SERVICE CENTER

Re: Sugarloaf Ridge State Park, Preliminary General Plan and Draft Environmental Impact Report

Dear Mr. Woodroof,

The following comments on the Preliminary General Plan and Draft Environmental Impact Report for Sugarloaf Ridge State Park are from the Milo Baker (Sonoma County) Chapter of the California Native Plant Society (CNPS).

General Comments:

1. We do not support the decision to omit project-level details from the Preliminary General Plan, nor to use a programmatic approach to the impact analysis for the General Plan. Programmatic EIRs are too general in their analysis to permit the public to comment in a meaningful way on the proposed actions and their potential impacts. **I.1**

   If the Department of Parks and Recreation (DPR) is able to state that the Plan includes a new observatory, new bathrooms with flush toilets and showers, a precise number of new campgrounds for a precise number of campers, new visitor centers, new trails, and is able to show the general locations for these facilities, then DPR should be able to go one step further and specifically describe the proposed facilities and complete a project-level analysis of their impacts. Without such a project-level analysis, it is extremely cumbersome for the public to comment on the true potential impacts, including impacts of individual project components and cumulative impacts. **I.2**

CNPS, Milo Baker Chapter, P.O. Box 892, Santa Rosa, CA 95402

When project components are reviewed piecemeal, as will happen under the current Plan, this places an undue burden on the public. It requires the public to maintain constant vigilance, looking for announcements that a plan component has reached the project implementation stage, and keeping track of comment deadlines over a period of many years. This drawn-out process subverts the true intent of CEQA, which is to disclose impacts to the public and to provide the public with the opportunity to comment at a stage of the process that allows time for changes to be incorporated into the project. **1.2 cont.**

We request that the General Plan be revised to include project-level detail for all new and upgraded facilities, and that the EIR be revised to identify specific impacts of individual project components and to propose specific mitigations for all significant impacts. **1.3**

2. Although the Programmatic EIR lacks a discussion of specific impacts, it is our conclusion that the proposed increases in visitor use, increases in equestrian use, and the construction and operation of new facilities—especially campgrounds in regions of the park that have been in a wilderness condition for many years—is likely to result in significant impacts to rare plants, their habitats, and other native vegetation, and in reductions in streamflow and water quality in riparian systems that support native vegetation. We request that the likelihood of significant impacts to these resources be clearly stated in the EIR. **1.4**

3. We support Alternative A as the preferred alternative for long-range development within the Park. Alternative A addresses the key issues faced at present, and provides opportunities for moderate increases in visitor access and visitor services. It is the most affordable of the three alternatives. It has the least potential of causing traffic problems and risk of wildfire. Most importantly, it has the least potential of causing significant adverse impacts to key natural resources, including sensitive plant species, their habitats, native vegetation, and water resources that support riparian plants. **1.5**

Specific Comments:

Chapter 2, Existing Conditions and Issues.
Section 2.2.2, pg. 2-29, Biological Resources.

Comment 4: This section lacks a meaningful discussion of methods used in compiling information on biological resources, and does not provide documentation of sources. No references are listed for "existing documentation." Names of "biologists familiar with the local biological resources" are not included. "Documents on file with the Department" are not listed or cited. There is no discussion of whether field studies were conducted for this project. Provide a methods section, list specific written and other sources and provide a list of biologists, other than employees of EDAW and State Parks, who were consulted in preparing the General Plan and the EIR. **I.6**

Chapter 2, Map 6.

Comment 5: The scale of this map is too small to provide any useful information. Enlarge the map so that it can be read. **I.7**

Chapter 2, pgs 2-30 to 2-34.

Comment 6: Within this discussion of vegetation types, the information on special status plants is inconsistent and incomplete. Incomplete information is given on the distribution of *Lomatium repostum* and *Ceanothus sonomensis*. No information is provided for other special status plants listed in Table 2.2 that occur, or may occur, within these vegetation types. Revise these paragraphs to include complete information that is consistent in coverage for all species. **I.8**

Chapter 2, Table 2-2. (Comments 7, 8, 9, 10, 11)

Comment 7: Regarding the "Potential for Occurrence" column, note that comprehensive rare plant surveys following CNPS and Department of Fish and Game guidelines have not been completed for any of the management zones of the SRSP General Plan Study Area, therefore, it is incorrect to state that "occurrences unlikely because not observed" when much of the Study area has not been surveyed for special status plants. Potential for occurrence of a special status plant within the Study Area should be based on 1) the presence of appropriate habitat for the plant within the study area, and 2) the distribution of the plant within and near the study area. Revise this table to provide more accurate information on potential for occurrence. **I.9**

Comment 8: Correct these misspellings: *Allium, Penstemon, Sidalcea hickmannii* ssp. *viridis, Sidalcea oregana* ssp. *hydrophilus*. Appendix C, pp. C-1 through C-14 contains additional misspellings too numerous to list here. These should also be corrected. **I.10**

Comment 9: Table 2-2 lists *Ceanothus confusus* as occurring in SRSP and HMRP, however, this species is not included in Appendix C, the list of plant species for the project area. Correct this discrepancy. **I.11**

Comment 10: Table 2-2 lists *Ceanothus divergens* as occurring in SRSP. What is the evidence for this, since Bowcutt and others do not list this species as occurring at SRSP? **I.12**

Comment 11: Table 2-2 lists as a source "EDAW 2002," for which there is no listing in the reference list in Chapter 5. Add the reference to Chapter 5. **I.13**

Chapter 2, 2.5.2, Natural Resources, Key Issues, pg. 2-103

Comment 12: How were these issues identified? **I.14**

Comment 13: We agree that minimizing impacts to plant resources from visitor use and the location of facilities is a significant issue, and that invasive non-native species are disrupting the ecological balance of the park.

Comment 14: Number (not bullet) the key issues so they can be referred to by number. For example, **I.15**
1. Minimization …
2. Invasive non-native …

Chapter 2, 2.5.2, pg. 2-104

Comment 15: We want to emphasize that plant resources cannot be protected unless thorough baseline surveys are completed prior to facility siting. We request that completing plant inventories and special status plant surveys, including mapping of special status plant locations, be given the highest priority. **I.16**

Chapter 3, Park Plan.

Chapter 3, pg. 3-5 and 3-6, second NR-1

Comment 16: There are two items labeled NR-1. Change the second to NR-2. I.17

Comment 17: We disagree with the statement that the General Plan implementation "is not dependent on completion of these studies," referring to biological inventories. Implementation of the General Plan, in total or in part, constitutes a "project" under CEQA. Projects under CEQA, unless they are exempt, require identification of significant impacts. Significant impacts to special status plants, native vegetation, and other important natural resources, cannot be identified unless properly conducted surveys are completed. The CNPS and the DFG have published guidelines that describe acceptable methods for conducting rare plant surveys. Surveys of this type have not been done for this project. Such surveys are not simply inventories, but are intended to document the geographic extent and number of individuals for all populations of special status plants. The results of this type of survey are essential if significant impacts are to be identified and mitigated. Mapping of rare plant locations should be completed before new facilities are sited, so that impacts to rare plants can be avoided or minimized at the siting stage of facility development. I.18

Chapter 3, pg 3-9. Special Status and native plant Goal and Guidelines.

Comment 18: We support the goal: "Protect and restore special-status and native plant species and communities," and Guidelines BIO-1 and BIO-2. However, the scenario described in BIO-3 is not adequate to protect special status plants. As described above under Comment 17, thorough surveys must be completed prior to the siting of new facilities, not just "prior to commencement of grading or construction …" I.19

Chapter 4, Environmental Analysis

Chapter 4, 4.1.3, Environmental Review Process

Comment 19: See Comment 1, above. I.20

Chapter 4, 4.4.2, Biological Resources, p. 4-11, Special-status Plant Species.

Comment 20: Under CEQA, protection of special status plants is not limited to those species that are officially state or federally-listed. Under CEQA, Section 15380, all plants that meet the criteria for state or federal listing are protected, not just those that are currently listed. In practice, this means that all species on the CNPS Inventory's 1B List (Plants rare and endangered in California and elsewhere) are afforded such protection. At least one CNPS 1B species, *Ceanothus sonomensis*, is known to occur in SRSP. Information on the protection status of CNPS List 1B plants should be added to this section, along with the statement that significant impacts to special status plants could occur if the General Plan is implemented. **I.21**

Chapter 4, 4.4.2, Biological Resources, Sensitive Upland Habitats, pg. 4-11.

Comment 21: The EIR should clearly state that significant adverse impacts to Sensitive Upland Habitats are possible if the General Plan is implemented. This conclusion is justified because of the extensive new developments that are proposed, and the lack of baseline information necessary to conclude that significant adverse impacts are unlikely. **I.22**

Chapter 4, 4.4.2, Biological Resources, Riparian and Aquatic Habitats, pg. 4-12.

Comment 22: The EIR should clearly state that significant adverse impacts to Riparian and Aquatic Habitats are possible if the General Plan is implemented. This conclusion is justified because of the extensive new developments that are proposed, and the lack of baseline information necessary to conclude that significant adverse impacts are unlikely. **I.23**

Chapter 4, 4.4.2, Biological Resources, Wetlands, pg. 4-12.

Comment 23: The EIR should clearly state that significant adverse impacts to Wetlands are possible if the General Plan is implemented. This conclusion is justified because of the extensive new developments that are proposed, and the lack of baseline information necessary to conclude that significant adverse impacts are unlikely. **I.24**

Chapter 4, 4.5.2, Unavoidable Significant Effects on the Environment, pg. 4-36.

Comment 24: We disagree that "the proposed General Plan would not result in any unavoidable significant effects." Without a project-level analysis, this cannot be determined. It is highly unlikely that the level of development proposed in the General Plan can be implemented without significant unavoidable effects, especially in the areas of water quality, riparian and wetland habitat quality, native vegetation and special status plants. The significance of impacts and the ability to avoid them cannot be determined without thorough surveys and analysis, which this General Plan and Programmatic EIR do not provide. **I.25**

Chapter 4, 4.5.3, Significant Irreversible Environmental Effects, pg. 4-37.

Comment 25: We disagree that "the proposed General Plan would not result in any significant irreversible environmental effects." Without a project-level analysis, this cannot be determined. It is highly unlikely that the level of development proposed in the General Plan can be implemented without significant irreversible effects, especially in the areas of water quality and riparian and wetland habitat quality, which support native vegetation, and possibly, to special status plants. The significance of impacts and the ability to avoid them cannot be determined without thorough surveys and analysis, which this General Plan and Programmatic EIR do not provide. **I.26**

Chapter 4, 4.6.2, Alternative A, pg. 4-43.

Comment 26: We support Alternative A as the preferred alternative. See comment 3, above.

We appreciate the opportunity to submit these comments on this important project.

Sincerely,

Lynn Houser

Reny Parker
Vice-President and Acting President

Lynn Houser
Conservation Chair

Milo Baker Chapter, California Native Plant Society

Cc: Gene Cooley, Plant Ecologist, California Department of Fish & Game
Liam Davis, CEQA and CESA Review, California Department of Fish & Game
Diane Hichwa, Conservation Chair, Madrone Audubon Society
Marsha Taylor, Conservation Chair, Sierra Club - Sonoma Group
Richard Dale, Director, Sonoma Ecology Center

Response to Letter 1

From: California Native Plant Society, Milo Baker, Sonoma County Chapter

The California Department of Parks and Recreation, Diablo Vista District, Silverado Sector (District) appreciates the comments received by the California Native Plant Society (CNPS). The Preliminary General Plan and Draft Environmental Impact Report (EIR) is a program level evaluation and as projects are developed based on need and the availability of funds, the District will value the involvement of the CNPS in site evaluations.

1.1 Use of a programmatic EIR

The Draft EIR is a programmatic EIR for the Sugarloaf Ridge State Park General Plan. The proposed General Plan consists of a variety of interrelated components to guide Department actions for the next 20 years or more. The EIR contains an appropriate level of detail in light of the nature and breadth of the proposed General Plan. This document presents numerous goals and guidelines, to protect and preserve the sensitive resources in the park, including native vegetation. Later specific plans will provide a more detailed CEQA analysis as needed.

As a program-level document, the Draft EIR does not analyze site-specific impacts of future activities at specific locations. Rather the Draft EIR describes generally the sorts of impacts that may occur, and describes the standards, best-management practices, regulations, or decision-making processes that would be followed to avoid such impacts. The EIR presents as much information as can be reasonably given at this program-level discussion. By law, the Department must comply with applicable responsible agencies' rules and regulations when implementing the components of the General Plan. Compliance with the standards set forth in the General Plan and by regulating agencies would address potential environmental impacts.

As required by CEQA, subsequent activities carried out pursuant to the General Plan would be reviewed to determine whether additional environmental analysis must be performed (State CEQA Guidelines 15168(c)). If the subsequent activity will have impacts that were not analyzed in the General Plan Draft EIR, then the Department would have to prepare an initial study analyzing those impacts (State CEQA Guidelines 15168(c)(1)),

One reason for development of the General Plan is to consider all potential future projects together as a whole and address the cumulative impacts that could occur if individual projects were planned and designed without regard to other park projects. Cumulative impacts refer to two or more individual effects which, when considered together, are substantial or which compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project, when added to other closely-related past, present and reasonably foreseeable future projects. The General Plan provides a set of goals and guidelines for resource protection and enhancement to be observed during park operations and provides standards and measures to follow when planning and constructing projects to reduce potential environmental

impacts, individually and cumulatively. The cumulative effects of the various park projects that could occur over time have been taken into consideration during the development and in the programmatic environmental evaluation of the General Plan.

1.2 Desire for a project-level analysis

The General Plan is a broad policy document that sets the direction and provides the vision for the park's management and development. The plan allows for future considerations of desired facilities, but is not intended to designate detailed facilities with specific size, design, and locations.

1.3 Desire for a project-level analysis

The level of detail provided in the General Plan is acceptable by CEQA standards as goals and guidelines are designed to guide resource stewardship, facility development and interpretation, and future land use management for the park. The purpose of General Plans is to set a reasonable range of size and type of facilities and approximate locations.

1.4 Determination of Impacts

The General Plan serves as a first-tier Environmental Impact Report as defined in Section 15166 of the California Environmental Quality Act (CEQA) Guidelines. The analysis of broad potential environmental impacts discussed in the Environmental Analysis will provide the basis for future second-level environmental review, which will provide more detailed information and analysis for site-specific developments and projects.

Because future projects would be required to meet the standards and performance measures to reduce potential impacts to a less-than-significant level as prescribed in the guidelines of the Preliminary General Plan and Draft EIR, it can be determined that the Plan would not result in any unavoidable or irreversible significant effects. The site-specific conditions present in a particular location would affect the manner in which projects are carried out, as directed by the applicable General Plan guidelines. It is not guaranteed that all of the proposals allowed in the General Plan will be deemed feasible after the completion of project level environmental review. In some cases the projects allowed by the General Plan may be excluded upon site-specific evaluations.

This general plan is a programmatic, or tiered, EIR. These are not mutually exclusive, and are encouraged in the CEQA Guidelines. Please refer to CEQA Guidelines Section 15152(h) which states: "There are various types of EIRs that may be used in a tiering situation. These include, but are not limited to, the following:…(3) Program EIR". CEQA Guidelines Section 15385 also states that "Tiering is appropriate when the sequence of EIRs is: (a) From a… program EIR to a program, plan or policy EIR of lesser scope or to a site-specific EIR." CEQA Guidelines Section 15162 refers to the requirements that would trigger a subsequent EIR be prepared for an EIR which has been certified for a project. This guideline does not refer to the tiering process, where subsequent environmental analysis and review is completed as

more detailed information and site-specific developments are proposed following a first tier EIR.

1.5 Support for Alternative A

Pages 4-43 and 4-44 in the Environmental Analysis, Section 4.6 Alternatives to the Proposed Plan, discusses the features of Alternative A and why it was not chosen as the Proposed Plan. Alternative A does not fully achieve the stated park purpose of vision. As presented in the Environmental Analysis, the park would not be well positioned to take on more visitors without future impacts. Because Alternative A does not address the existing demand for recreation, which currently exceeds the parking and camping capacity within the park, and does not address the anticipated increase in demand in the future, Alternative A would exacerbate ongoing environmental damage by not planning for increased visitor use. Existing circumstances, such as illegal parking in sensitive habitats because parking lots are full and trampling of native vegetation around overcrowded campsites, would continue to be a problem.

1.6 Biological References

Chapter 2, pg. 2-29, Biological Resources. Existing documentation on biological resources was provided by the California Natural Diversity Database (CNDDB) and the McCormick Sanctuary Natural Resource Analysis and Enhancement Plan, prepared by Circuit Rider Productions, Inc. The biologist familiar with the local biological resources that were consulted include: Marla Hastings, District Ecologist and Margaret Baumgratz, Assistant District Ecologist who both reviewed the Preliminary General Plan and Draft EIR. Preliminary field work evaluated existing conditions in some developed areas of the park. Caitlin Cornwall, the Assistant Director and Biologist of the Sonoma Ecology Center, was consulted at the onset of the evaluation of the existing conditions report.

1.7 Size of the Vegetation Map

Map 6, the Vegetation Map in Chapter 2, is an example of the detailed information contained in the Geographic Information System (GIS) developed for this project. Review within the electronic GIS always provides the best opportunity for evaluation, as vegetation can be compared with other layers simultaneously. The vegetation map shown in the Preliminary General Plan/Draft EIR is available on the Department's website: www.parks.ca.gov. The electronic copy of the vegetation map has sufficient resolution to be considerably enlarged for more detailed review of this coverage.

1.8 Revisions to text describing vegetation types

We have revised the text to provide more detail on the distribution of *Lomatium repostum* and *Ceanothus sonomensis* and to make text references to special-status plant species more consistent by noting those species from Table 2.2 that are known to occur in SRSP to the appropriate plant community descriptions. We felt it would be cumbersome and unnecessary to insert text references for species from Table 2.2 that potentially occur but are not known to occur in those plant communities in SRSP.

Text revisions include additions to the descriptions of various vegetation types as follows:

- **Non Native Grassland –** Added; narrow-anthered California brodiaea (*Brodiaea californica ssp. leptandra*) occurs in grasslands on Sugarloaf Ridge SP.
- **Chamise Chaparral -** Napa hog-fennel (*Lomatium repostum*), an uncommon species which is on the California Native Plant Society watch list (List 4), occurs in this community in Sugarloaf Ridge SP and the region.
- **Mixed Chaparral -** Four special-status plant species are known to occur in this vegetation type on Sugarloaf Ridge SP: Sonoma ceanothus (*Ceanothus sonomensis*), Rincon Ridge ceanothus (*C. confusus*), Calistoga ceanothus (*C. divergens*), and narrow-anthered California brodiaea.
    - **Jepson Musk-Brush Chaparral -** A healthy population of Sonoma ceanothus (*Ceanothus sonomensis*) occurs along Goodspeed Trail, on the south-facing slope west of Bear Creek. This species is limited in distribution to the Hood Mountain Range in Sonoma and Napa Counties and is considered rare statewide by the California Native Plant Society (California Native Plant Society 2001).
- **Coast Live Oak Woodland -** A special-status plant species, Napa false indigo (*Amorpha californica var. napensis*) is known to occur in openings of woodlands in Sugarloaf Ridge SP.

1.9 Potential for occurrence on special status plant list

The Department welcomes the completion of the comprehensive rare plant surveys following CNPS and California Department of Fish and Game (DFG) guidelines for the management zones of the SRSP General Plan Study Area. This analysis is an important component of project level development. Until this time, please see the change made to Table 2-2, below.

Table 2-2
Special-Status Species in the Sugarloaf Ridge State Park General Plan Study Area

SPECIES	HABITAT	POTENTIAL FOR OCCURRENCE	CNPS	DFG	USFWS
PLANTS					
Marin Checkerbloom *Sicalcea hickmanii* ssp. *viridis*	Serpentine chaparral	Habitat present, occurrence possible, although not observed	1B	--	--

1.10 Appendix C revisions

Appendix C has been revised to include the correct spellings of plant names. The revised list (which will replace the list in Appendix C of the Draft EIR) is provided in Appendix A.

1.11 Ceanothus confuses

The reference in Table 2-2 to Ceanothus confusus as occurring in SRSP and HMRP has been added to the list of plant species for the project area, which is included in Appendix A.

1.12 Ceanothus divergens

The source for the information is CNDDB. The buffered area, established by CNDDB, from the individual plant location extends into Sugarloaf Ridge State Park.

1.13 Table 2.2 Source

Table 2-2 will be revised to include the indication that the EDAW, 2002 source was a site visit as follows: Sources: CNDDB 2002; EDAW 2002, site visit. As this was a site visit, it will not be added to Chapter 5, References.

1.14 Identification of Key Issues

The "Key Issues" identified in Chapter 2, Section 2.5.2, Natural Resources, were identified during the planning process, and documented in a paper entitled "Issues and Analysis". The paper was prepared by EDAW with involvement by the District and the Northern Service Center. This paper summarizes key issues to be addressed in the Preliminary General Plan including: Broad Planning Issues, Characteristics of the Park, Accommodating Visitors, and Resource Protection and Management Issues.

1.15 Bullets rather than numbers

The Department also wishes to protect plant resources at SRSP.

The decision was made to use bullets rather than numbers since there are only a few key issues identified in any particular section. Numbering was not determined to be necessary.

1.16 Baseline vegetation surveys prior to facility siting

The completion of a comprehensive biological inventory of the park is indeed a good idea, though not necessary for this first-tier general plan and programmatic EIR. The General Plan provides an understanding of significant resource values as the basis for addressing general planning issues, and establishes a framework and direction for more focused resource planning that occurs beyond the approval of the plan. Collection of more detailed resource data may be appropriate and necessary in subsequent more-detailed planning phases. As facilities are proposed, site specific surveys will be completed. These surveys will identify individuals or populations of special status species. When the project scope is fully defined, potential impacts can be analyzed and appropriate mitigation measures identified before they are sited.

The Department will work with the CNPS in the evaluation of rare and threatened plants in the process of siting of new facilities.

1.17 Formatting

Chapter 3, pp. 3-5 and 3-6. In Chapter 3, pp. 3-5 and 3-6, the second NR-1 has been changed to NR-2 as follows:

NR-1: Utilize existing GIS system for Sugarloaf Ridge State Park to continue evaluation of relationships between different natural resource systems, to track resource management activities, and to evaluate progress towards individual resource goals.

NR-2: Maintain a cumulative list and GIS database of plant and wildlife species in the park. Update the natural resources inventory summarized in Chapter 2, Existing Conditions, and associated GIS database with plant and wildlife species observed during surveys conducted for individual improvement projects or other observations by park personnel or other qualified observers over time. To the extent feasible, conduct additional surveys to identify the biological resources in areas of the park that have not yet been surveyed, including areas acquired since the last inventory. (General plan implementation, however, is not dependent on completion of these studies.) This list should be kept on file, and used for future biological studies, proposed project impact analysis, and as a baseline for educational purposes.

1.18 Biological Inventories

Chapter 3, pp. 3-5–6. Development of a comprehensive biological inventory is not within the scope of this General Plan and first-tier EIR, nor is it required by General Plan directives. The District has followed Public Resources Code (PRC) Section 5002.2(a) which states that the general plan "shall serve as a guide for the future development, management, and operation of the unit." Biological inventories will be prepared as needed during specific project phases.

Please also see the responses to Comments 1.16 and 1.1.

1.19 Special Status and Native Plant Goals and Guidelines

Chapter 3, pg. 3-9. Please see response to Comment 1.16 which refers to the appropriate time to conduct biological studies. Guideline BIO-3 will be revised as follows to incorporate the comment.

BIO-3: As part of the planning and design process for area-specific projects, and prior to commencement of final siting for new facilities or enhancements, the Department will develop the appropriate project-level CEQA documentation and environmental evaluation and mitigation measures necessary to avoid, reduce, or minimize potentially significant impacts to special-status plant species. These measures may include:

- A qualified botanist using appropriate protocols will identify any suitable habitat for special-status plant species that potentially could occur in the affected area, and will conduct appropriately timed surveys if such species may be disturbed by the proposed project. Data from Chapter 2, Existing

Conditions, the appropriate resource agencies, and CNPS will be consulted to identify species of concern.

1.20 Use of a programmatic EIR

Please see response to Comments 1.1, 1.2, 1.3, and 1.4.

1.21 Special Status Plants

Chapter 4, pg. 4-11. Information on the protection status of CNPS List 1B plants is provided in Chapter 2 in Table 2.2. Baseline information about rare plants on CNPS List 1B will be further developed prior to implementation of specific projects. Goals and guidelines established for project implementation are specifically designed to avoid adverse impacts to sensitive habitats.

1.22 Sensitive Upland Habitats

Chapter 4, pg. 4-11. Please see response to Comment 1.21.

1.23 Riparian and Aquatic Habitats

Chapter 4, pg. 4-12. Please see response to Comment 1.21.

1.24 Wetlands

Chapter 4, pg. 4-12. Please see response to Comment 1.21.

1.25 Unavoidable Significant Effects

Chapter 4, pg. 4-36. The Draft EIR addresses the potential impacts of proposed facilities commensurate with the scope of the General Plan and this first-tier environmental document. The environmental analysis presents goals and guidelines to direct future facility development. Mitigation measures that avoid or reduce impacts to water quality, riparian and wetland habitat quality, native vegetation and special status plants are addressed throughout the environmental analysis. The Department also requires a further evaluation of specific facilities and management plans at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level is necessary in what is considered the second-tier environmental review.

1.26 Significant Irreversible Environmental Effects

Chapter 4, pg. 4-37. Please see Response to Comments Number 1.25.

1.27 Support for Alternative A

Comment noted. See response 1-3.

The revised Plant List, which will replace the same list provided as Appendix C in the Preliminary General Plan and Draft EIR, can be found in Appendix A of this Response to Comments document.

Letter 2

From: "Sandra Perry" <mcclearn@napanet.net>
To: <wwood@parks.ca.gov>
Date: 1/25/04 10:06AM
Subject: comments on general plan

Dear Mr. Woodroof:

I am sending my comments to you about the General Plan for Sugarloaf Ridge State Park including the McCormick Sanctuary. (Couldn't find the questionnaire so I am just emailing my comments to you.) I am Sandra Learned Perry and I represent my family, the McCormicks, Learneds and Perrys.

We are excited to see the General Plan coming together and in general like the ideas being suggested. However, we have concerns for our privacy and that of our neighbors on our neighboring private lands and wonder how you plan to address this. Specifically, we already have bikers and hikers cutting, bending, trashing our gates, signs and fencing to get into our property. I have even found bikers at our cabin who told me they "got confused". While they were polite, they couldn't explain to me what was confusing about the sign, locked gate and fence! I see bike tracks weekly into our land. **2.1**

We are also thrilled to see you have hired Sonoma Ecology Center to do the Management and Stewardship Plan for the Sanctuary. In fact, I am meeting them today to give them information and to answer any questions they have for us. We are assuming that you will incorporate their plan into your General Plan and are requesting the GP indicate such. I will ask Sonoma Ecology Center to make a proposal on fencing between our private lands and your lands. While, we want to keep it as open as possible for the sake of the wildlife, we are very tired of the people who are trespassing. **2.2**

We are also concerned about the seed disbursement from horses. What efforts are being made to address this issue? When you acquired McCormick Sanctuary from my family, star thistle was basically not found on the land. We realize you have a major infestation of star thistle at Sugarloaf and don't want to see it spread to either our private lands or to the Sanctuary. We are also aware that all of us have some invasive grasses that should be addressed and look forward to working with you on these issues. **2.3**

While we support the proposed limited-access campsites in two more remote areas (#2 and #5 on your map), we have big concerns about privacy issues. An even bigger concern is about the arrow going from #5 toward #1 as it goes right through our private land. We are assuming this is a mistake that needs to be corrected immediately. **2.4**

A question I have is about #1 on your map. Are you going to construct a new visitor and operational facility or are you and County Parks sharing the existing one? Are there any plans for a secured interpretive facility? If not, would you consider including such in your long-range general plan? **2.5**

I can't attend your meeting on February 4th but am very interested in how this evolves. I would appreciate hearing from you.

Sincerely, Sandra

CC: <jcrossman@parks.ca.gov>

Response to Letter 2

From: Sandra Perry

The California Department of Parks and Recreation (The Department) especially appreciates your concern for the headwaters of the Santa Rosa Creek Watershed. The Department manages park properties for public use and discourages inappropriate and destructive behavior as you have described.

2.1 Protecting the property rights of adjacent land owners

Protecting the property rights of adjacent land owners will be addressed through the implementation of specific projects. Upon certification of the General Plan and EIR, future projects will be obligated to follow the guidelines identified in Chapter 3 of the General Plan. Those guidelines will be modified to emphasize protection of property rights as follows:

TRAIL-6: To the extent feasible and where appropriate, install trail signs with levels of difficulty (per Departmental standards). For trail projects near adjacent properties install signs at appropriate intervals that clarify park boundaries (pg. 3-24).

INTERP-3: Primary Theme #3: Protecting park resources requires help on several levels. (pg. 3-26).

A. Enlightened visitor use—explain the need to reduce impact.

Describe effect of personal choices on the natural and cultural landscape. At a finer scale, visitors' behavior can have significant impacts on the park; interpretive materials will encourage visitors to tread lightly or "leave no trace" as they explore this wildland, and to take that same ethic home with them to their urban and suburban environments. Visitors will be reminded to avoid trespassing and to respect private lands.

2.2 The McCormick Sanctuary Management and Stewardship Plan

The Sonoma Ecology Center's Management and Stewardship Plan is the next-level plan in the tiered evaluation process that builds upon this General Plan. Since the Management and Stewardship Plan is being produced after this Sugarloaf Ridge State Park General Plan and EIR, it cannot be incorporated into the document. However, the Sonoma Ecology Center has contributed to the development of this General Plan, and the Department values the information that will be provided. The Department recommends that those involved with the management of the Santa Rosa Creek Watershed refer to the document when it becomes available.

2.3 Seed disbursement through horse manure.

The Department shares your concern about invasive species, in particular the yellow star thistle. As you are aware, there is an aggressive program at Sugarloaf Ridge State Park to control invasive species. Control of seed disbursement particularly by horses is a difficult

problem, since the Department cannot control where horses graze prior to coming to the Park, or the seeds that they carry into the park.

Since 1993, there has been an aggressive program at Sugarloaf Ridge State Park to control invasive species, particularly yellow star thistle. Most of the wildland areas within Sugarloaf, once severely infested with yellow star thistle, now have only minor infestations. The Department plans to 'hold the line' where these weeds once dominated, and not allow them to reoccupy. This effort must be annually maintained, especially alongside roads and trails, where new infestations are most likely to occur. Annual inspections of the roads, trails, and wildland areas will also assure that the Department is able to identify and treat new infestations as necessary.

2.4 *Trail connection from upper Bear Creek (Area 5) to Los Alamos Trailhead (Area 1)*

The arrow on Map 2, titled General Plan Key Concepts (pg. ES-8), conceptually indicates a proposed trail connection between Area 5 toward Area 1; it does not show a specified route, but rather a desire to connect two different areas of the park with a trail. While a connection to the McCormick property from the original SRSP was one of the objectives in the original acquisition, more detailed surveys of property boundaries and topography have revealed that such a connection is infeasible in the current configuration of properties. The General Plan suggests alternatives for resolution of this condition. Resolution could include the provision of public access where feasible, or the potential acquisition of additional properties or easements from willing sellers; any resolution would include continued consideration for the needs of adjacent landowners.

2.5 *Proposed development at the Los Alamos trailhead (Area 1 on Map 2)*

The facilities at the Los Alamos trailhead (Area 1, on Map 2, pg. ES-8), including the existing visitor and operational facility, are owned by Sonoma County Regional Parks (SCRP). The Department and SCRP share management responsibilities in the area since the trailhead now serves both parks. The intent of the General Plan guideline for this area is to show a willingness to cooperate on projects of mutual interest. If an interpretative center is desired by SCRP in this location, the Department would support the project. Guideline SRCW-2, will be modified to allow for an interpretive center as funding becomes available. Any proposed facilities would require a project-level environmental evaluation.

SRCW-2: Work with SCRP to develop additional visitor use and operational facilities at the Los Alamos Road parking and trailhead area at the north end of Hood Mountain Regional Park. Facilities could include a ranger office, employee residence, interpretive sites, an interpretive center, potable water and restrooms (pg. 3-46).

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Letter 3

David B Dixon
PO Box 1323,
Glen Ellen, CA 95442

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NORTHERN SERVICE CENTER

21 Jan 2004

Wayne Woodroof,
Statewide General Plan Program,
California Department of Parks and Recreation,
Northern Service Center
One Capitol Mall, Suite 500,
Sacramento CA 95814

Re Draft EIR of Sugarloaf General Plan

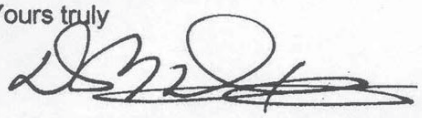
Dear Mr. Woodroof,

As a resident of Nuns Canyon Rd, your Draft EIR contains several things which I feel have been ignored or inadequately addressed

1. I understand that you are proposing to install a gate across Nuns Canyon Rd in the vicinity if the Beltane quarry. Is this legal? Nuns Canyon Rd is a publicly maintained road for one mile from its Junction with State Route 12 and has been for many years. **3.1**
2. What provisions will be made to provide unimpeded access to the residents and their employees, guests and suppliers? **3.2**
3. The road runs very close to Calabasas Creek where various organizations are trying to improve the fish habitat. What provisions are proposed for removal of horse manure before it enters the creek? **3.3**
4. What arrangements will be made to prevent Park visitors from trespassing on private property
5. What improvements are proposed to improve the road so that it can accommodate horse and pedestrian traffic
6. Will the State have insurance to cover damage to vehicles or their occupants from out of control horses?
7. The increased fire risk is not addressed. **3.4**
8. Doesn't CEQA require notice to individual neighboring property owners? **3.5**

I look forward to your response, and am **3.6**

Yours truly **3.7**

 **3.8**

David B Dixon

Response to Letter 3

From: David B. Dixon, Nunns Canyon Road Resident,

The General Plan is a broad policy document that sets the direction and provides the vision for the park's management and development. The plan is not intended to designate detailed facilities with specific size, design, and locations. Mr. Dixon's comments focus on specifics of potential environmental impacts that could occur in the Nunns Canyon[1] area. Development of parkland facilities in that area would constitute a new project for which a design would need to be developed ,and a second-tier environmental review (Project Level) would be conducted to evaluate impacts of that specific project.

3.1 Gate across Nunns Canyon Road

The General Plan suggests the possibility of a gate across Nunns Canyon Road. There have been discussions between the District and Sonoma County Public Works Department about the feasibility of such a proposal. Accommodation of residents' needs would be a primary concern in determining feasibility.

3.2 Provisions for unimpeded access on Nunns Canyon Road

Access provisions would be the subject of a project-level design and environmental evaluation prior to any implementation.

3.3 Restoration of fish habitat on Calabazas Creek and control of horse manure

Development of a project in the Nunns Canyon area to improve public access into SRSP would require an evaluation of appropriate trail uses and potential impacts. Avoidance and/or effective mitigation would be required to protect fish habitat in Calabazas[2] Creek.

3.4 Prevention of trespassing on private property

Please see response to comment 2.1. In addition, the General Plan addresses prevention of trespassing on private property near Nunns Canyon. To further emphasize this point, NC-5 will be modified as follows:

NC -5: Prior to opening park visitor access from Nunns Canyon Road, develop management strategies to allow safe use of the road by park visitors and residential property owners which could include but not be limited to the following;

- Allow residential property owners to maintain vehicular access to their properties from Nunns Canyon Road. Consider options such as coded access for residents, their guests and suppliers.
- Discourage visitor trespassing on private property adjacent to the park by posting the park boundary, controlling vehicular access to areas east of the

[1] The spelling of "Nunns Canyon" is consistent with US Geological Survey maps. There is, however, common usage of the spelling "Nuns Canyon" as referenced by Thomas Brothers Maps and street signs.

[2] The spelling of "Calabazas Creek" is consistent with US Geological Survey maps. There is, however, common usage of the spelling "Calabasas Creek" as referenced by Thomas Brothers Maps and street signs.

quarry area, ranger surveillance, or other methods to control access to private property.

- Restrict park visitor vehicular access beyond the quarry (pg. 3-48).

3.5 Improvements to Nunns Canyon Road to accommodate horses and pedestrians

The General Plan provides general recommendations for project level improvements in the area of Nunns Canyon Road so that the road could better accommodate horse and pedestrian traffic as projects are developed. The remainder of Goal NC-5 is provided below for the reader's reference:

NC-5: Continued

- Consider ways to separate pedestrian, bicycle, and equestrian uses from vehicular use of the roadway. Where this is infeasible, use traffic management strategies, such as automated traffic control gates, speed limits, signage, enforcement, and other methods to slow vehicular traffic.
- Consider widening the road or constructing shoulder pullouts without damaging the riparian corridor.
- Work with Sonoma County Public Works Department to identify areas for soil stabilization to improve and maintain Nunns Canyon Road to reduce erosion (pg. 3-49).

3.6 State insurance to cover out of control horses

Specific details of a situation involving an out of control horse and the potential damage caused to a vehicle on a public road would need to be assessed on a case-by-case basis.

3.7 Increased fire risk

Open fires would not be permitted within the Nunns Canyon area.

3.8 CEQA Notice to neighboring property owners

A variety of methods were used to notify interested individuals in compliance with CEQA Guidelines Article 7, Section 15087.

The Notice of Availability (NOA) was published in the Santa Rosa Press Democrat on December 14, 2003. Copies were also posted at the entrances of Sugarloaf Ridge State Park. Notices were also sent out via e-mail to all individuals who had supplied the District with an e-mail address.

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Letter 4

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5505
FAX (510) 286-5513
TTY (800) 735-2929

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Mr. Wayne Woodroof
California Department of Parks and Recreation
One Capitol Mall, Suite 500
Sacramento, CA 95814

Dear Mr. Woodroof:

Sugarloaf Ridge State Park General Plan – Draft Environmental Impact Report (DEIR)

Thank you for continuing to include the California Department of Transportation in the environmental review process for the general plan (proposed project). We have reviewed the DEIR and have the following comments to offer:

1. Are the existing left-turn lanes on eastbound State Route 12 (SR 12) at the Adobe Canyon Road and Nunns Canyon Road intersections long enough to accommodate Year 2005 With Project and Year 2012 With Project traffic? If not, this project should be paying its fair-share towards any necessary improvements to provide adequate vehicle storage. **4.1**

2. Appendix D, Page D-1: If the Sunday PM peak period in summer is considered the busiest time period in the traffic analysis scenarios, why where traffic counts conducted on a day well into fall (Sunday, November 17, 2002)? **4.2**

3. Tables D-4 and D-6: Using to the numbers in columns 1 and 4 in Table D-4, we estimated the maximum daily traffic generation to Adobe Canyon to be 762 vehicles, or 1524 vehicle trips per day. Assuming the Park is open 10 hours per day, the average hourly trips to and from Adobe Canyon are 152 vehicle trips. It is noted in Table D-6 that the Summer Sunday Peak Hour General Plan Build-out Trip Generation for Adobe Canyon is 100 trips (47 trips in and 53 trips out.) The peak hour trip generation is only two-thirds of the 10-hour average? Please explain this difference is peak hour trip generation. **4.3**

4. The Sonoma Country Inn project was not included in the list of cumulative projects (Table 4-6.) This project proposes a 10,000 case winery, restaurant, spa, 50-room inn, and 11 residential lots on a 186-acre site. This project should be included in the cumulative traffic analysis. **4.4**

5. On page 4-25 the California Department of Park and Recreation agrees to pay a fair-share proportional cost of signalizing the Adobe Canyon Road/ SR 12 intersection. The California Department of Transportation currently does not have a program for signalizing this intersection, although it is included as part of a roadway rehabilitation project. However, with the current State budget constraints, the roadway rehabilitation project will likely be delayed.

4.5

We look forward to receiving a response to our comments at least ten days prior to certification of the EIR pursuant to Section 21092.5(a) of the CEQA.

Should you require further information or have any questions regarding this letter, please call Maija Cottle of my staff at (510) 286-5737.

Sincerely,

Timothy C. Sable

TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

c: State Clearinghouse

Response to Letter 4

From: The California Department of Transportation

These responses address the comments of the California Department of Transportation (Caltrans). Their concerns address the traffic impacts of the General Plan.

4.1 State Route 12 left-turn lanes

The existing SR 12/Adobe Canyon Road southbound left turn lane has approximately 90 feet of striped lane plus a 35-foot long transition space, providing queuing space for 4 to 5 vehicles. Projected maximum left turn lane queuing was evaluated using a methodology described in the Institute of Transportation Engineers (ITE) Journal, November, 2001, Estimating Queue Length at Unsignalized Intersections. Assuming project completion, projected through- and turning-movement traffic on SR 12 during a summer Sunday afternoon peak hour in the year 2012 would require a projected queue length of three to four vehicles, requiring approximately 75 to 100 feet of vehicle stacking space. The existing intersection southbound left turn lane in the intersection has adequate queuing space to meet this requirement.

4.2 Traffic Counts

Appendix D, Page D-1. Traffic and parking counts for locations within the park were conducted as soon as work on the project was authorized (second week in November, 2002). Although this was a fall day, the weather was clear, sunny and warm. The traffic analysts requested review of the resultant counts by park staff to ensure that although counts were conducted in fall, they reflected peak use of park facilities. Park staff asserted that the count day was representative of peak use (summer or fall).

Sunday afternoon (2:00–5:00 PM) traffic counts were conducted by Crane Transportation Group on November 17, 2002 at the Highway 12 intersections with Los Alamos Road, Adobe Canyon Road and Nunns Canyon Road, as well as along Adobe Canyon Road at the entrance to Sugarloaf Ridge State Park. The late fall counts were then seasonally adjusted to reflect peak summertime traffic conditions along Highway 12 and along Adobe Canyon Road at the State Park entrance. Seasonal adjustments for Highway 12 were based upon extensive previous traffic count surveys by Crane Transportation Group, while the summertime park volumes were developed by State Park staff.

Future base case roadway volumes reflect Sunday summer conditions. Park use projections were generated by park staff to represent 2005 and 2012 Sunday afternoon peak use of park facilities.

4.3 Maximum Daily Traffic Generation

Pages D-5 and D-7. The EIR analysts chose to present a conservative analysis of intersection operation for the 2005 and 2012 planning horizons. The traffic count data for summertime Sunday PM peak hour conditions on SR 12 indicated the peak traffic period to occur between 3:00–6:00, with the peak hour occurring 3:30–4:30. Note: although the Sugarloaf Ridge DEIR text stated that the Sunday ambient peak hour occurred between 4:30–5:30, this is incorrect,

and has been corrected in the EIR text. The Sunday afternoon peak hour was found to occur 3:30–4:30. For Table D-6, Park rangers were asked to provide park trip generation for the 3:30–4:30 time period (i.e., the SR 12 ambient peak hour). Table D-6, footnote 1 states that 3:30–4:30 is the peak hour of SR 12, not the peak hour for the park. The controlling factor in the traffic analysis is the SR 12 Sunday PM peak time period.

4.4 Cumulative Projects

Page 4-39. Omission of the Sonoma Country Inn project in Table 4-6 was unintended. Table 4-6 was taken directly from the Sonoma Country Inn EIR, and should have been amended to include the Sonoma Country Inn project; the SR 12 traffic volumes used in the analysis included the Sonoma Country Inn project. Please refer to Sonoma Country Inn EIR Master Response F (provided in Appendix B), which was prepared to address a range of questions concerning cumulative traffic and projections to year 2012 for the SR 12 highway corridor.

4.5 Signalization

Page 4-25. This information that Caltrans has no current program or funded project to signalize the SR 12/Adobe Canyon Road intersection is acknowledged.

Letter 5

SONOMA ECOLOGY CENTER

Wayne Woodruff
Statewide General Plan Program
California Department of Parks and Recreation
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 95814

January 27, 2004

Re: Comments on Sugarloaf Ridge State Park Preliminary General Plan and Draft EIR SCH No. 2003012051

Dear Mr Woodruff,

The Sonoma Ecology Center is the only organization focused on the long-term ecological health of the Sonoma Valley, the watershed containing most of the planning area. The Ecology Center was founded in 1990 and has a staff of 21. Through our Research Program, Restoration Program, and fee-for-service GIS/GPS services, we have had a long involvement with many of the lands in the General Plan area. We have obtained multiple grants with the Silverado District to address badly eroding roads and trails in State Parks in the area, done fisheries and botanical research and mapping work in the Parks, worked with Sonoma State University on Sudden Oak Death and vegetation research in Sugarloaf, and taken groups of volunteers to remove invasive species in the Parks. We also contributed erosivity and vegetation maps and natural resource data to EDAW for the preparation of this General Plan.

Using funds from the California State Parks Foundation, we are preparing long-term management and restoration recommendations for the McCormick Sanctuary and neighboring lands. These recommendations will be available in the next month. One conclusion that is already clear is that the bold trail connection drawn on the General Plan's maps from the Red Barn area across McCormick will not happen in the next 10 years, if ever.

GENERAL COMMENTS

Our general comments have been stated very clearly in the January 19 letter from the Milo Baker Chapter of CNPS. The General Plan needs to state that surveys for sensitive natural resources will occur before any new facilities, including trails, are <u>sited</u>, not before they are <u>built</u>. **5.1**

The document needs a table clearly comparing the proposed actions and the daily visitor capacity of the General Plan and the alternatives. **5.2**

205 First Street West, Sonoma, CA 95476 • (707) 996-9744 • fax (707) 996-1744
sec@vom.com • www.sonomaecologycenter.org • Sonoma Valley Watershed Station (707) 996-0712

We support all the actions in Alternative A.

SPECIFIC COMMENTS

We support development of a trailhead, parking, and restrooms at the Nunns Canyon trailhead. **5.3**

We support establishing two to four primitive campsites throughout the General Plan area. However, these should be sited at least 2 miles by trail from the lower, concentrated camping areas or trailheads, and should not be available to equestrians or accessible to visitors by vehicle. Camping and walking in the company of vehicles is a completely different experience from camping and hiking in the company of nature. **5.4**

We oppose expansion of the family campground in Adobe Canyon. **5.5**

We oppose bringing any vehicular access to any camping areas above the existing observatory in Adobe Canyon. Camping and walking in the company of vehicles is a completely different experience from camping and hiking in the company of nature. **5.6**

We support establishing parking areas along Highway 12 or other existing trafficked area. **5.7**

Trails, especially trails that will carry horses, must be kept far away from creeks and off of steep slopes. **5.8**

The populations of pigs and turkeys should be reduced by a number of means. Is it possible to hold hunts for the public, possibly bow-hunting only? **5.9**

Do not widen roads leading to Parks or within Parks. Use other traffic-calming techniques to slow and reduce traffic. These roads are generally on steep slopes in areas designated as having high biological and scenic values. Wider roads directly degrade these values. **5.10**

Rock climbing is an existing and growing constituency not mentioned in the document. Climbers tend to establish trails to climbing areas. New areas will become destinations in McCormick and Beltane. The Park needs a policy on bolting. **5.11**

Views from trails, inside and outside the park, should be protected. **5.12**

Bikes and horses should be kept off trails completely during winter. They should use fire roads only, not single track trails. **5.13**

Respectfully submitted,

Caitlin Cornwall
Assistant Director, Biologist
sec-cornwall@vom.com

Response to Letter 5

From: Sonoma Ecology Center

5.1 Surveys for sensitive natural resources

Please refer to response to Comment Number 1.16 which discusses why the completion of a comprehensive biological inventory of the park is not appropriate for this first-tier level of General Plan.

5.2 Proposed actions and daily visitor capacity comparison table

The requested table is provided at the end of this set of responses.

5.3 Support development at the Nunns Canyon trailhead

Comment noted. The issue of road/trail access along Calabazas Creek persists. This current road can not be maintained without severe impact to the creek itself in the form of armoring or channelization. Neither would be good for the park. The Department would likely not be able to obtain permits to do much here. Road to trail conversion could possibly occur in this area where smooth trail tread isn't an issue, although relocating the road/trail away from the creek is most desirable. Although Don Beers, Roads and Trails Supervisor at North Coast Redwoods District, performed some evaluative work at Beltane, he has not been to the quarry on Nunns Canyon, and hasn't seen the road up Calabazas.

5.4 Support establishing two to four primitive campsites

Comment noted. Primitive campsites would not be accessible by personal vehicle.

5.5 Oppose expansion of Adobe Canyon family campground

Comment noted.

5.6 Oppose vehicular access to camping areas above Adobe Canyon Observatory

Comment noted.

5.7 Support parking areas along Highway 12

Comment noted.

5.8 Trails kept away from creeks and steep slopes

Comment noted. Trail siting is beyond the focus of the General Plan and this EIR.

5.9 Pig and turkey reduction

Comment noted. Hunting for the control of wild animals is beyond the focus of the General Plan and this EIR; however, the Department policy doesn't allow hunting on park lands. The current UC Berkeley (UCB) non-native turkey research project has yielded no turkey sightings

over the last month by UCB. This may be due to seasonal or other factors. Although turkeys have been sighted in the park, they are scarce at this time.

5.10 Oppose widening roads

Comment noted.

5.11 Policy on bolting rocks for mountain climbing

Current policy[3] states that Superintendents may designate specific rock climbing areas, restrict the types of climbing, require mitigation, or close areas pursuant to a posted notice. Rock climbing activities should not be routinely restricted, as such restrictions expose the Department to liability. Per Government Code Section 831.7, the Department is immune from liability for visitors engaged in such inherently dangerous recreational activities as rock climbing. Districts will not take part in rock climbing activities, or inspect, place or maintain climbing equipment. Climbers are responsible for maintaining their own equipment, and the Department is responsible for insuring that resources are adequately protected.

When new climbing areas are proposed, a CEQA review would be initiated to determine if impacts from climbing are detrimental to scenic, natural, cultural and/or recreational resources. As such, a project specific review would not be appropriate for this first-tier review of the General Plan. (Please see response to Comment Number 1.4 which clarifies that CEQA allows use of a tiered environmental evaluation, starting with a more general programmatic EIR, then moving to more specific project level EIRs).

5.12 Protect views

Comment noted.

5.13 Bikes and horses kept off of trails in winter

Comment noted. This policy recommendation could be considered for a future Park trails plan which could include seasonal closures to bikes and horses everywhere during wet conditions.

[3] Departmental Notice #93-25 added policy as DOM Chapter 1622.11.

This table was provided at the second public workshop on May 22, 2003 and will be added to the comparison of alternatives after page 4-48. The preferred alternative grew out of Alternative C with some revisions, such as elimination of facilities at Harr Ranch.

Table 4-7 Alternatives Comparison Table

FACILITIES	EXISTING CONDITION	ALTERNATIVES		
		A	B	C
Max Visitors at One Time (Preliminary Estimate)[b]	900	1,000	1,300	1,700
Max Visitors Per Day (Preliminary Estimate)[b]	1,700	1,800	2,400	3,000
Trail Connections				
McCormick–Red Barn trail connection	No	Yes	Yes	Yes
Hood Mtn.–McCormick trail connection	No	Yes	Yes	Yes
Beltane–Upper Adobe Canyon trail connection	No	Yes	Yes	Yes
Bear Creek trail connection	No	No	Yes	Yes
Facilities in Upper Adobe Canyon				
Camping Facilities				
Family Campsites (8 people per site)	49	44	58	70
Move Large Group Campsite (50 people)	No	Yes	Yes	Yes
Add Reservable Corrals for Equestrian Camping	No	No	No	Yes
Limited Access Small Group Campsites (15 people per site)	0	0	1	4
Primitive Campsites (8 people per site)	0	0	0	8
Expand Observatory (classrooms & restroom)	No	No	Yes	Yes
Horse Barn				
Horse Concession	Yes	Yes	Yes	Yes
Maintenance Storage	Yes	No	No	No
Interpretive Center	No	No	Yes	Yes
Picnic Area	No	No	Yes	Yes
Visitor Center (no changes)	Yes	Yes	Yes	Yes
New restroom facility with showers	No	Yes	Yes	Yes
Picnic areas	5	5	8	8
Consolidate maintenance shop and equipment storage into new facility	No	Yes	Yes	Yes
Parking [c, d] total: (new):	241	253 (12)	356 (103)	418 (62)
Max Visitors at One Time (Preliminary Estimate)[b]	900	1,000	1,300	1,700
Max Visitors Per Day (Preliminary Estimate)[b]	1,700	1,800	2,400	3,000
Facilities in Broader Areas of the Park				
McCormick				
Los Alamos Road trailhead & parking (by County)	30	30	30	30
Construct new bridge(s) over Santa Rosa Creek for access to Hood Mtn and McCormick	No	Yes	Yes	Yes

Table 4-7 Alternatives Comparison Table (cont.)

FACILITIES	EXISTING CONDITION	ALTERNATIVES		
		A	B	C
Additional visitor use and operational facilities (Ranger station and/ or interpretive center)	No	No	No	Yes
Primitive campsites (8 people per site)	0	0	2	4
Beltane				
Quarry area restoration and trailhead	No	Yes	Yes	Yes
Parking [c]	0	20	30	40
Interpretive displays	No	No	No	Yes
Picnic areas	No	No	Yes	Yes
Primitive campsites (8 people per site)	0	0	2	4
Red Barn				
Primitive Campsites (8 people per site)	0	0	2	4
Harr Ranch				
Picnic area	No	No	Yes	Yes
Interpretive displays	No	No	No	Yes
Limited access small group campsite (15 people per site)	0	0	0	1
Special event facility (25 people max)	No	No	No	Yes
Restroom facilities	No	No	No	Yes
Hood Mountain Regional Park (by County) [e]				
Pythian Road trailhead & parking	No	Separate County Action		
Primitive campsites (Azalea Camp)	No	Separate County Action		

[b] *Visitor estimates are based on parking availability and observed turn-over rates.*

[c] *Parking space numbers are estimates. Parking will be sized to meet growing demand over time.*

[d] *Parking in Upper Adobe Canyon includes expansion of the day use lot, visitor center lot, horse barn lot, and parking for additional small group and family campsites.*

[e] *State Parks supports the County's development of the Azalea Campground and Pythian Road trailhead and parking for Hood Mountain Regional Park.*

Letter 6

Cathryn Charette
1200 Nuns Canyon Road
Glen Ellen, CA 95442
(707) 833-2364

Mr. Wayne Woodroof
Manager, Statewide General Plan Program
California Department of Parks and Recreation
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 95814

January 26, 2004

RE: Sugarloaf Ridge State Park Preliminary & Draft Environmental Impact Report

Dear Mr. Woodroof,

In reviewing the Sugarloaf Ridge State Park Preliminary General Plan and Draft Environmental Impact Report, the following are concerns I would like addressed:

The plan states that there are "costly" plans in the works to move horse trails away from Sonoma Creek at Sugarloaf State Park because of the negative environmental impacts to the creek, but at the same time, plans are being made to install horse trails along the Calabazas Creek at Nuns Canyon Road.

Why is it not assumed that if horses are destructive to the Sonoma Creek, they will likewise be destructive to the Calabazas Creek? The Sonoma Ecology Center and the California Conservation Corps have recently done major reconstructive work to the Calabazas Creek at Nuns Canyon Road to ensure environmental support for the steelhead salmon. The state is supplying funds to restore the creek, at the same time, funding a project that will degrade the creek. Perhaps the plan is to spend money installing parking for horse trailers and trails for horses, only to later spend more money moving the trails because of a lack of foresight. This is certainly consistent with what is happening at Sugarloaf State Park. **6.1**

Increased vehicular traffic, foot traffic and horse traffic along this stretch of the riparian corridor will result in erosion into the creek causing sedimentation into the creek

1

affecting the spawning habits of salmon and steelhead. All traffic should be directed away from the creek because of this.

More research needs to be done on the environmental impact of this project due to the rarity of this surviving natural creek.

Finally, I was not notified of the community scoping session on February 2, 2003, or any other community sessions involving this project, even though I am on the mailing list, have an address on Nuns Canyon Road, and have spoken to many of the people in planning directly. I also know other parties who were not notified of meetings or deadlines regarding this project. I, therefore, am requesting an extension of the January 27, 2004 deadline to allow for more input on this project by other interested parties who were not informed of your agenda. **6.2**

Sincerely,

Cathryn Charette

Response to Letter 6

From Cathryn Charette, Nunns Canyon Road Resident.

These responses address the comments of Ms. Charette. Her concerns raise important issues to consider while evaluating the specifics of development in the Nunns Canyon area. These specifics will be the subject of a separate project to be designed, evaluated, and implemented as funds are available.

6.1 Horse Trails, Water Quality, and Erosion

The General Plan is a broad policy document that sets the direction and provides the vision for the park's management and development. The plan is not intended to designate detailed facilities with specific size, design, use, or location. Therefore, specific actions at the quarry and along Nunns Canyon Road will be the subject of project level evaluations on a wide variety of issues including strategies for erosion protection and consideration of ways to avoid and/or mitigate the effects of horses on water quality and spawning habitat. Options for consideration in that project-level analysis could include, but are not be limited to: relocating the trail away from Calabazas Creek, limiting the number of horses allowed in the Canyon at any one time, and possible use of bridges at creek crossings.

6.2 Project Notification

Please refer to response to Comment Number 3.8 which describes project notification to interested individuals. Additionally, the public is welcome to submit comments to the District after the deadline and they will be considered separately.

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Letter 7

Valley of the Moon Alliance

Mr. Wayne Woodroof
Manager, Statewide General Plan Program
California Department of Parks and Recreation
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, California 95814

January 25, 2004

RECEIVED
JAN 29 2004
NORTHERN SERVICE CENTER

Reference: Sugarloaf Ridge State Park Preliminary General Plan Draft EIR

Dear Mr. Woodroof:

The Valley of the Moon Alliance believes the traffic information used in the Sugarloaf Park draft EIR is incorrect and impacts at intersections are understated. Additional planned development along Highway 12 and the projected visitor increase to the park will cause a significant level of traffic. Therefore, any future development that affects traffic also requires careful approval. This is controlled by the Sonoma County Board of Supervisors and the state needs to be active participant in determining traffic impacts. If not, a reduction in permitted visitors to the parks will need to be implemented. **7.1**

Page 4-21 2005 and 2012 Base Case Intersection Operation—traffic volumes
This draft EIR utilizes the information from the Sonoma Country Inn draft EIR, which was done by Crane Transportation Group in February 2003. It also states that it was approved by the County of Sonoma. The County has **NOT APPEOVED** the Crane traffic report or the DEIR. There are numerous problems with the original study. **7.2**

Attached to this letter are the written comments provided to the PRMD on the traffic element of the Sonoma Country Inn DEIR from TPG traffic Consultants, Attorney Allison Hargrave and the public comments from George Ellman and the Valley of the Moon Alliance.

One of the major deficiencies in the Sonoma Country Inn EIR was dealing with the cumulative impacts of other Valley projects. It failed to identify half of the projects that will impact the north end of the Sonoma Valley. The **Cumulative Project listing on table 4-6 on page 4-39 does** reflects these missing projects, but fails to pick up the impact of the Sonoma Country Inn's 50 unit resort, 11 home subdivision and 10,000 case winery and event center. Because of its size and the traffic generated, this resort complex will have a significant impact on the entire valley. It may also necessitate reduction of the park project as described in the draft EIR. Although you identified the missing cumulative developments, your EIR doesn't address their impacts. Also, **7.3**

P.O. Box 95 Kenwood, California 95452 Hotline: 707-833-6695 www.votma.org

nothing at all is listed for the increased size of the Valley of the Moon Children Home nor the new Mayo Winery.

As the result of these deficiencies and those related to the other issues in the Sonoma Country Inn draft EIR, the planning commissioners agreed with us and have sent the document back for extensive rework. (See attached commissioner's comments on traffic). As of today, January 25th, 2004 there has been no public review on the unresolved issues that still need to be addressed. **7.4**

3.3.1 Adobe Canyon Statement of Management Intent
Please consider adding a recommendation to monitor traffic to and from the park and report this information to the PRMD and Board of Supervisors on an annual basis. This would help in determining traffic impacts on future projects and approvals to be made by the County. **7.5**

To summarize, the growth of visitors to the park from 2001 to 2002 has increased by 100% year to year, to 143,943. This is approximately 2800 visitors or 1400 cars every weekend. Once discovered many of the visitors will continue to return thereby, increasing the traffic pressure on Highway 12 and Adobe Canyon Road. The State and County Parks Department management must lobby the County Supervisors to carefully review all projects over the next 20 years in order to allow for the proposed build out and usage as described in the Sugarloaf Park EIR. **7.6**

Valley of the Moon Alliance
Board of Directors

Del Rydman
President

Attachments from Sonoma Country EIR:
Valley of the Moon Alliance comments on element 5.2
TPG Consulting concerns on traffic
Battaile & Hargrave, Valley of the Moon Attorneys on traffic
George Ellman e-mail May 20, 2003
Planning Commissioner Comments on Traffic element

Attachments from the Sugarloaf Park EIR:
George Ellman e-mail January 11, 2004

Response to Letter 7

From The Valley of the Moon Alliance

These responses address the comments of the Valley of the Moon Alliance, a group that promotes the preservation, protection and maintenance of the agricultural character, natural resources and rural beauty of the Sonoma Valley. Their concerns address the traffic impacts of the General Plan.

7.1 Traffic Impacts

The commenter has incorrectly quoted the DEIR. The DEIR states that methodology for determining base case conditions was approved by the County of Sonoma. It is common practice for EIR traffic analysts to consult the staff of the lead agency and reach agreements as to the methodology to be used for EIR analysis. This is generally done at the very beginning of the process of preparing an EIR traffic analysis.

7.2 2005 and 2012 Base Case Intersection Operation–traffic volumes

Page 2-21. These letters have been addressed as part of the response to comments on the Sonoma Country Inn DEIR, and are available to the public through the County of Sonoma PRMD.

7.3 Sonoma County Inn, Master Response F

Page 4-39. Please see comment 4-4 that acknowledges omission of Sonoma Country Inn in table 4-6, and also references inclusion of that project's traffic volumes in cumulative calculations. Also, see Sonoma Country Inn Master Response F[4] (and attachments), developed to respond to these issues.

7.4 Sonoma Country Inn Draft EIR

The DEIR preparers were asked to respond to all issues raised during the public comment period. The public hearing for the Sonoma Country Inn is scheduled on March 18, 2004.

7.5 Recommendation to monitor traffic on Adobe Canyon Road

The commenter requested revision of the Adobe Canyon Statement of Management Intent (page 3-36) to include traffic monitoring to and from the park. This is not the best place for such a recommendation regarding park circulation. However, such a monitoring program could provide needed base data, if developed in a coordinated approach with Sonoma County Public Works, since the Adobe Canyon Road is a county-maintained road. To address the issue, the CIRC-3 guideline will be revised as follows:

CIRC-3: Encourage Sonoma County Public Works Department to widen Adobe Canyon Road near the intersection with State Route 12, stripe to improve and clearly separate the two westbound approach lanes to State Route 12, and signalize the State Route 12 / Adobe Canyon Road intersection when warranted.

[4] Sonoma Country Inn Master Response F is included in this report as Appendix B, with the permission of the Sonoma County PRMD staff.

As part of the planning and design process for area-specific projects, the Department will review areas of potential impacts in accordance with CEQA prior to site-specific development. During the project-level environmental review, the Department should assess the potential increase in trips generated by the project and propose appropriate mitigation measures at that time. The Department does not have funding to annually monitor traffic to and from the park.

7.6 Visitor Growth

Comment Noted. The commenter is directed to pages 2-85 through 2-88 for clarification regarding visitor attendance.

Letter 8

January 25, 2004

Mr. Wayne Woodroof
Statewide General Plan Program
California Department of Parks and Recreation
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 95814

RECEIVED
JAN 2 9 2004
NORTHERN SERVICE CENTER

Dear Mr. Woodroof:

Thank you for the opportunity to comment on the Preliminary General Plan and Draft Environmental Impact Report for Sugarloaf Ridge State Park. The following comments are grouped into general and specific comments.

GENERAL COMMENTS

1. While the document concludes that the Plan would not result in any unavoidable or irreversible significant effects (Sections 4.5.2 and 4.5.3), the report does not provide data, information, analysis and results to support this finding. In general, the document relies on general descriptions of proposed actions that make it impossible for the reader to evaluate the past effectiveness of similar actions or likely future impacts of the proposed actions, and thus subverts the intent of the California Environmental Quality Act (CEQA). The document should provide a thorough analysis of the impacts of the proposed facilities. As the document stands, it is not possible to draw the conclusion that the preferred alternative, or other alternatives, will have no significant unavoidable or irreversible impacts on the environment. **8.1**
2. The document should present a cohesive and complete regulatory framework and should assess the compliance of proposed actions with applicable regulatory standards. For example, the document does not note that there are two Water Quality Control Plans that apply to different areas of the project area, does not discuss beneficial uses of water that may be affected by the project, does not discuss water quality objectives with which any park activity (existing or proposed) must comply, and does not note the relevant Clean Water Act Section 303(d) listings in the watersheds. Future drafts of this document should correct this deficiency. **8.2**
3. The document states in several locations that water quality is a significant concern. However, the document does little to describe current areas of concern with respect to water quality, current actions to address those concerns, how this Plan will address ongoing water quality issues, or impacts associated with proposed park development. The document should disclose current areas of concern with respect to water quality, and how the proposed projects would avoid or mitigate any additional impacts. For example, the document notes that existing roads are a water quality concern, but provides no specifics regarding road network, road problems, road redesign needs, or road remediation activities. Neither does the document provide specifics as to additional road needs for any of the alternatives, or road design standards that would be employed to address water quality impacts associated with new or existing roads. **8.3**

-1-

4. The document should include water quantity as an issue of concern and present data, information, analysis and results at a level of detail sufficient for the public to evaluate the current level of water use, the estimated increases in water use associated with the various alternatives under consideration, and the environmental impacts associated with such increases. In Section 3, the document should be revised to include a separate goal of protecting water quantity in the watersheds of interest. The impact evaluation should include at a minimum an assessment of increased water use impacts on streamflow and the effects of changes in streamflow on aquatic habitat, especially summer rearing habitat for salmonids. **8.4**
5. The document is deficient in not analyzing the project and cumulative impacts of the proposed actions on water resources, even though there is adequate information available to perform such an analysis. The project area comprises all or most of the headwaters of several biologically significant streams, and as such the Park's activities constitute all or most of the cumulative impacts likely to occur in these subwatersheds. The document should present a thorough analysis of cumulative impacts on water resources. **8.5**
6. The document makes numerous statements regarding water resources and impacts of park-associated actions on water resources, but provides no references or citations to support the statements made and conclusions reached. The document should present the data and information relied on in reaching the conclusions made in the document. **8.6**
7. Based on the limited information presented in this document, Alternative A is the least environmentally damaging alternative and should be selected. **8.7**

SPECIFIC COMMENTS

Comment 8. p. 2-27. The report should reference publicly available documents or provide a map and supporting information showing the locations of roads with respect to the stream network in the project area, roads identified as problematic with respect to erosion and sediment delivery to streams, roads that have been re-engineered, and roads that are slated for re-engineering work. The document should also discuss or reference design standards used in the re-engineering work. For example, the document states that culverts were increased in size, but does not state either the recurrence interval of the flood that the culverts were sized to pass, nor how the associated flow estimates were developed. The document provides no information on whether design standards used for recent or planned road upgrades are consistent with BMPs or the standard of practice, whether or what sort of post-upgrade monitoring is ongoing or planned, nor how such results would be used. This is important, because the document suggests, in Guideline WQ-1 (p. 3-6), that future actions would be 'appropriate', and that their effectiveness would be monitored, and that monitoring would be used to 'make necessary changes'. **8.8**

Comment 9. pp. 2-27 and 2-36. The third paragraph on p. 2-27 references the biological resources section. Review of the biological resources section (p.2-36) did not reveal any additional information on steelhead occurrence or distribution, or on Sonoma County Water Agency monitoring. Water Agency fisheries monitoring results would be relevant to this document and should be presented. **8.9**

Comment 10. p. 2-28. The note to Table 2-1 is a direct quotation from a document prepared by this writer for the Sonoma Ecology Center, and is neither shown as a direct quote or otherwise cited. Please provide a citation for the note to Table 2-1. Citations should be provided for all data and information used in developing this document. **8.10**

Comment 11. p. 2-28. USGS has reinstalled the gage on Sonoma Creek, at the Agua Caliente Road crossing. **8.11**

Comment 12. p. 2-36. Please provide information on the usage of all creeks in the study area by salmonid species, including all reaches known or considered likely to support salmonid spawning and rearing. Areas used as summer rearing habitat by salmonid species (e.g., steelhead) are particularly sensitive and should be identified as clearly as possible. **8.12**

Comment 13. p. 2-66. In the discussion of existing water supply, the document acknowledges that the capacity and sustained yield of the existing well is not known. The document does not speak to the potential effects of current or increased water withdrawal on streamflow. Please provide data and information on well characteristics (including depth, screened interval, diameter, etc.) pumping capacity and sustained yield, and current and potential effects of water withdrawal on streamflow. This is important because the proposed future development in the Sonoma Creek drainage represents a significant increased level of usage over current usage, and apparently would rely on increased pumping from this well. **8.13**

Water Quality Guidelines, pp. 3-6 and 3-7.

Comment 14. WQ-1. The guideline should be supported by a discussion of what is meant by appropriate source-specific abatement actions, including references to support the basis for considering particular actions appropriate. The types and uses of monitoring should be discussed. The process for integrating monitoring results into the park's planning and activities should be described. **8.14**

Comment 15. WQ-2. What specific concerns are addressed by this guideline? How will minimization be achieved? The guideline should be revised to include avoidance as a first objective, before minimization. **8.15**

Comment 16. WQ-4. The reference for measuring the setback is not provided. Is it from the centerline of the stream? To be consistent with other setback guidelines, the setback should be measured from the bankfull width of the channel. **8.16**

Comment 17. WQ-6. Why is this guideline limited to consideration of effects on the 100-year peak discharge? Standard texts on stream hydrology (e.g., Leopold, 1994) indicate that most sediment transport occurs at bankfull flow. Changes in land use can cause changes in flood flows and flood-affected areas at flows substantially more frequent than **8.17**

a 100-year event. The guideline should be revised to consider impacts associated with a range of hydrologically significant flows, including bankfull flow.

Comment 18. WQ-7. This guideline addresses water quantity, not water quality. The document should be revised to include a separate goal of protecting water quantity in the watersheds of interest. This is particularly important with respect to summer flow conditions in salmonid rearing streams, where reduced streamflow may be a significant limiting factor on salmonid rearing success. **8.18**

Comment 19. WQ-8. The first sentence of the guideline should include avoidance before minimization. The guideline or supporting discussion should provide references or a discussion of what is meant by BMPs, erosion control measures, and water quality protection standards. **8.19**

Comment 20. WQ-9. What specific measures would be considered? How will the impacts associated with the existing facilities located in close proximity to Sonoma Creek be addressed? **8.20**

Comment 21. WQ-10. What are best available technologies that would be considered, have been considered or are in use at other park facilities? **8.21**

Comment 22. WQ-11. What areas have septic system problems? What monitoring data or other observations are available that indicate the nature and severity of the problems? The document should present a specific discussion in support of this guideline. **8.22**

Comment 23. WQ-12. The guideline is vague. What is meant by a 'reasonable' time? What is meant by 'to the extent feasible'? **8.23**

Comment 24. Table 3-1. Some of the environmental quality indicators for water quality lack specificity. What is meant by 'improved' steelhead habitat? What is meant by 'properly functioning'? Other indicators do not address the potential for impacts adequately. For example, the only indicator associated with sediment is bank erosion. While this is an important effect associated with increased sedimentation, it is not on its own adequate as an indicator of water quality conditions. The document should include an indicator that directly addresses the direct effects of roads and trails on streams by seeking to minimize the discharge of sediment from management activities (including construction, road maintenance and operations, trails, and similar activities). The document should also include a water quality indicator that is more sensitive to changes in environmental conditions related to sediment. Turbidity would be an excellent candidate. **8.24**

Comment 25. Section 4.4.1, p. 4-7 and 4-8. The text identifies a number of possible impacts to water quality, but then provides no analysis or detail to support the conclusion that the proposed actions will not result in significant impacts. The text refers back to the guidelines which are general and non-specific. The document does not make a credible case for the conclusions reached. **8.25**

Comment 26. Section 4.4.1, Water Supply, p. 4-9. The Plan proposes a new restroom facility with showers. Along with increased visitor facilities, this would result in a substantial increase in water use. The text acknowledges that the adequacy of existing supplies to meet the increased demand is not known. In addition, no estimate of the magnitude of the increased demand is presented. The statement that project-level impact analysis (presumably associated with increased water usage) is not possible is not credible. Surely State Parks has estimates of the relationship of increased visitor usage and enhanced visitor facilities (such as showers) on water use. The document should present estimates of water use associated with the various alternatives, and present an analysis of the impacts of these levels of increased use on water supply availability and reliability, and on the impacts of increase groundwater use on streamflow in the affected streams. This is particularly important given the use of streams in the park and nearby downstream reaches as salmonid rearing habitat. **8.26**

Comment 27. Section 4.5.2. At least with respect to water quality and water quantity issues, the conclusion that the Plan would not result in any unavoidable significant effects is not supported by the information presented in this document. **8.27**

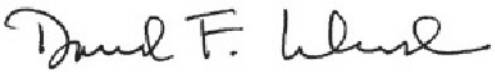
Comment 28. Section 4.5.3. At least with respect to water quality and water quantity issues, the conclusion that the Plan would not result in any significant irreversible effects is not supported by the information presented in this document. **8.28**

Comment 29. p. 4-40. The statement that cumulative impacts from increased water use would not be significant overlooks the linkage of surface water and groundwater. In the dry season, including the periods of highest use of park facilities, groundwater accounts for the entire streamflow of the creeks in the park and downstream reaches. Park activities account for or would account for most or all of the cumulative impacts on water quantity in these subwatersheds. The document is deficient in not analyzing the project and cumulative impacts of the proposed actions on water resources; even though there is adequate information available to perform such an analysis. **8.29**

References

Leopold, L., 1994. A View of the River. 298 pages. Harvard University Press.

Sincerely,



David F. Leland
210 Chestnut Avenue
Sonoma, CA 95476

Response to Letter 8

From: Mr. David F. Leland, City of Sonoma Resident

Thank you for your detailed questions and comprehensive review of issues surrounding water quality and quantity at Sugarloaf Ridge State Park. We are replying to you as a private citizen. In the process of preparing the plan, the Department did have discussions with the North Coast Regional Water Quality Control Board on May 28, 2003 with Andrew Jensen.

8.1 Analysis to support findings not provided

See responses to Comments 1.1 and 1.4, which describe the requirements of a programmatic EIR and clarify that CEQA allows use of a tiered environmental evaluation, starting with a more general programmatic EIR, then moving to more specific project level EIRs.

8.2 Regulatory Framework

As a program-level document, the Draft EIR does not analyze site-specific impacts of future activities at specific locations. Rather, the Draft EIR describes generally the sorts of impacts that may occur, and in the guidelines describes the standards, best-management practices, regulations, or decision-making process that would be followed to avoid such impacts.

The introductory paragraph for the Water Quality goals and guidelines on page 3-6 of the Preliminary General Plan and Draft EIR notes that the park lies within the jurisdiction of two RWQCBs, which "are responsible for adopting and implementing the water quality control plan that sets the water quality standards and control measures for surface water and groundwater." The General Plan guideline PROJ-1 directs the Department to comply with all relevant laws and regulations during project-level design and construction. In addition, WQ-8 specifically directs the Department to adhere "to water quality protection standards and control measures available in the water quality control plan for the region."

Compliance with the General Plan guidelines, and standards set forth by the RWQCB and other relevant regulatory agencies when components of the Plan are proposed at a project-level would address potential environmental impacts to water quality.

The introductory paragraph on page 3-6 will be modified as follows to include the beneficial uses of water within and flowing from Sugarloaf Ridge State Park:

> Sugarloaf Ridge State Park contains the headwaters of Santa Rosa Creek and Sonoma Creek, including its tributaries of Bear Creek to the north and Calabazas Creek to the south. The ridges within the park form the dividing line between the two watersheds. These watercourses provide important aquatic habitat; support sensitive wetland and riparian vegetation along the stream banks; and provide water for a range of wildlife within the park and region. Stream flow in all creeks flowing out of Sugarloaf Ridge State Park support steelhead and Chinook salmon spawning and summer rearing habitats.
>
> In 1996, the Bay Area Water Quality Control Board, under the guidelines of the federal

Clean Water Act, Section 303(d), listed the Sonoma Creek watershed as 'Impaired.' This listing places more stringent standards on monitoring, quality, and quantity of water related to beneficial uses, including fisheries, to which the Department must adhere.[5] Water quality and spawning habitat for steelhead and Chinook salmon could be affected by visitor disturbance of streambeds and increased sedimentation and pollutant loads from construction of new facilities and impervious surfaces. Potential changes in the groundwater table from increases in water use could also affect stream flow. However, conscientious management and proposed methods to reduce erosion ensure adequate stream flow for salmonid spawning and protect water quality of the creeks that flow through the park.

8.3 Current areas of concern for water quality

See response to Comment Number 1.4 which clarifies that CEQA allows use of a tiered environmental evaluation, starting with a general, programmatic EIR, then moving to more specific project-level EIRs.

As a General Plan, this document identifies general issues to consider during project-level evaluation and provides goals and guidelines to direct future actions by the Department. As stated on page 1-2 of the Draft Plan, "A General Plan is not a project-specific document and does not typically define specific objectives, methodologies, or designs on how to accomplish its goals." Implementation methods and project-specific actions may change over the years, but the General Plan provides the vision for the park's future, and therefore is general in its scope and flexible in its proposed approaches for solving future management problems.

While the document does not disclose specific locations of concern, which could change over time, it does identify potential causes of water quality degradation within the park and provides guidelines for avoiding or limiting their effects (beginning on page 4-7 of the Draft EIR). The Draft EIR describes generally the sorts of impacts that may occur, and in the guidelines describes the standards, best-management practices, regulations, or decision-making process that would be followed to avoid such impacts.

The commenter requests specific information about the current road network and precise remediation activities and monitoring planned with respect to water quality.[6]

As stated on page 1-3 of the General Plan, major programs and projects to be implemented during the life span of the General Plan will require additional planning, including additional project-specific compliance documents. Guideline WQ-8 addresses the design, construction and maintenance of roads using best management practices for erosion control and includes

[5] The Sonoma Ecology Center is currently preparing a water quality control plan for the Sonoma Creek watershed. Discussion with Caitlin Cornwall, February 16, 2004

[6] Regarding recent work to improve water quality, State Parks has been proactive in land stewardship. Last year the Department spent approximately $150,000 to improve water quality by relocating the Meadow Trail and make improvements to road grading and culverts. A new bridge was also built to replace a creosote log bridge. A recent contract with Sonoma State University will evaluate current road and trail corridor locations and conditions, and to investigate prescriptions for road and trail repairs, alternate routes and treatment options as well as their relationship to riparian corridors. This will be done by June 2005.

adherence to water quality protection standards and control measures available in the water quality control plan for the region. Identification of specific locations for stabilization and determination of appropriate remediation actions, as the commenter requested, would be included in the project-level process to reduce sources of sediment into Sonoma Creek, (or other tributaries) as directed by guidelines WQ-1 and WQ-2. Post-project monitoring and evaluation as directed by WQ-1 would allow for adaptive management to achieve the desired water quality goals. The specific type and extent of monitoring would be determined at a project level, according to the specific needs and goals of the project.

To more clearly address water quality as it relates to the existing roads network, Water Quality Guideline WQ-8 (pg. 3-7) and Circulation Guideline CIRC-2 (pp. 3-19–20), presented in the General Plan, will be modified as follows:

WQ-8: Design, construct and maintain new and existing buildings, roads, bridges, and drainage and other facilities using best management practices for erosion control and surface runoff to avoid or minimize sediment and other pollutants in storm water flows to the maximum extent practicable. Develop appropriate project-level CEQA documentation and NPDES permits, providing the environmental evaluation and mitigation measures necessary to avoid, reduce, or minimize potentially significant impacts to water quality. Principal control measures will include, but are not limited to, the following:

- As time and funding allow, identify existing areas of concern with respect to water quality and develop plans to remediate as appropriate to fulfill the intent of guidelines WQ-1 and WQ-2
- Remedial erosion and drainage control both during and after construction
- Installation and maintenance of erosion and surface runoff control measures
- Evaluate proposed alterations to existing drainage patterns so as not to result in increased erosion and sedimentation or increased flood flows
- Controls on non-point source discharges from new facilities (i.e. impervious surface coverage)
- Adherence to water quality protection standards and control measures available in the RWQCB's water quality control plan for the region
- Factoring the needs of sensitive aquatic species into the timing and implementation of any work that results in streambed alteration or riparian disturbance to avoid adverse impacts to these species
- When feasible, avoiding construction in the rainy season

CIRC-2: Improve and maintain primary visitor access roads to avoid or minimize adverse effects on the environment and to safely accommodate expected visitor use. Pay special attention to use by vehicles pulling horse trailers.

- Identify areas for potential improvements along existing roads for erosion control, stabilization, and reduction of sediment-causing conditions.
- (Remaining bullets are unchanged.)

8.4 Water Quantity

See response to Comment Number 1.4 which clarifies that CEQA allows use of a tiered environmental evaluation, starting with a more general programmatic EIR, then moving to more specific project level EIRs.

To further clarify the water quantity issue, the Water Quality guidelines, as presented in the General Plan, will be modified to include the following Guideline:

WQ-15: Stream flow in all creeks flowing out of Sugarloaf Ridge State Park should not be reduced below the amount needed to support salmonid spawning and summer rearing habitats.

- For all projects proposing to use water originating within the watersheds of Sugarloaf Ridge State Park, provide an assessment of increased water use and potential effects of changes in stream flow on aquatic habitat, especially for salmonids.

Similarly, Guideline PROJ-4 will be modified as follows:

PROJ-4: As part of the planning and design process for area-specific projects, conduct an analysis of potable water availability and wastewater capacity, as appropriate, when determining where and how utilities (e.g., sewer; water; drainage) will be provided. For all projects proposing to use water originating within the watersheds of Sugarloaf Ridge State Park, provide an assessment of increased water use and protocol for evaluating, monitoring, and adjusting potential effects of changes in stream flow on aquatic habitat, especially for salmonids.

As a program-level document, the General Plan provides a 20-year or longer vision for the park. The Draft EIR describes generally the sorts of impacts that may occur, and in the guidelines, describes the standards, best-management practices, regulations, or decision-making process that would be followed to avoid such impacts. The Draft EIR clearly identifies the construction of a new restroom facility as a subsequent project that could potentially result in an impact to the groundwater source. It also references the General Plan guidelines that require feasibility studies, environmental review, and development of appropriate mitigation measures at a project-level to avoid or minimize impacts to the groundwater source. It is not guaranteed that all of the proposals allowed in the General Plan will be deemed feasible after the completion of project-level environmental review. In some cases the facilities allowed by the General Plan may be excluded upon site-specific evaluations.

The specific water quantity information requested by the commenter would be considered as part of project-level analysis of activities for which feasibility studies, monitoring protocol, and adaptive management protocol would be required by guidelines PROJ-1, PROJ-4, and ADOBE-2, and WQ-15.

8.5 Cumulative Impacts on Water Resources

See response to Comment Number 1.1 regarding cumulative impacts addressed through use of a programmatic EIR. Also see response to Comment Number 1.4 which describes the CEQA allowed use of a tiered environmental evaluation from a programmatic EIR to a project level EIR. Also see response to Comment 8.4 and 8.26 regarding water supply and stream flow.

As the commenter noted, the project area comprises all or most of the headwaters of several biologically significant streams, and as such, the Department's activities constitute all or most of the cumulative impacts likely to occur in these sub-watersheds. It is acknowledged in the Draft EIR that because the headwaters of several streams are located in the park, any degradation of the water quality could exacerbate cumulative impacts downstream. The General Plan includes guidelines to not only reduce the potential effects to water quality resulting from new facilities development, but also includes beneficial, pro-active guidelines such as correcting existing sources of pollution/sedimentation; encouraging water conservation and other methods to reduce water demand; restoring and enhancing sensitive riparian and wetland habitats; and maintaining and allowing the potential future acquisition of large expanses of near-wilderness which would contribute to groundwater recharge and preservation of water quality. So, on a program-level, these beneficial actions work to improve the overall quality of environmental resources of the park. Where information was not available for detailed project-level analysis, the General Plan provides general information about potential environmental impacts that occur with implementation of the projects, and provides measures or further studies and environmental analysis at a project level to ensure the sum of individual projects cumulatively meets the overall resource protection goals of the Plan.

The Draft EIR analysis also evaluated the effects for a broader geographical area, considering the potential cumulative impact of known development projects in the surrounding area and the implementation of the General Plan. As discussed in the Draft EIR, the measures in place to limit adverse impacts to water quality when new projects are developed within the park and the beneficial actions outlined in the General Plan, result in no cumulatively considerable overall impacts to water quality as a result of the General Plan.

8.6 References

An introductory paragraph will be added to the Water Resources section, as follows:

> Significant water resources in the General Plan study area were determined through a review of existing documentation; consultation with the Sonoma Ecology Center and Department employees. Analysis and assessment from two documents in particular

were used—the McCormick Sanctuary Natural Resource Analysis and Enhancement Plan, prepared by Circuit Rider Productions, Inc. (1999) and the Summary Report, 1998 S.B. 271 Watershed Assessment within Santa Rosa Creek prepared by Pacific Watershed Associates (1998). The former document provided an assessment of erosion problems due to roads, culverts, and gullies. The latter document assessed upland sediment sources and large stream channels and developed an implementation plan for controlling erosion and sediment yield from all lands within Santa Rosa Creek Watershed.

Specific references within the text will be modified as follows:

(pg. 2-27) In 1997, representatives of the California Department of Fish and Game and the National Marine Fisheries Service inspected the North Fork and observed both good riffle pool development and pools deep enough to provide rearing habitat for salmonids in low-flow summer months. However, the North Fork also exhibited a layer of fine sediments (fines) covering the gravels, cobbles, and boulders such that salmonid eggs would have little chance of survival. The fines may originate from several sources, including degrading road cuts that parallel a third of the length of the North Fork (Circuit Rider Productions 1999, pg. 12).

Hydrology Modifications

(pg. 2-27) Road development for power lines and fire control, in addition to ranching and logging roads, has caused the greatest modification to the natural hydrology. New drainages have inadvertently been created parallel to existing drainages, causing severe erosion problems. Road re-engineering work conducted in 2001 and 2002 remediated these conditions on several miles of degraded roadbeds within the Sugarloaf Ridge State Park. During these efforts, culverts were increased in size and properly placed to avoid off-road impacts and accelerated sedimentation. The roadbeds were also outsloped to prevent water from being carried down the roadbeds, which also causes hydrologic modifications. Several additional miles of degraded road have been identified for future repair work (Circuit Rider Productions 1999; Pacific Watershed Associates 1998).

8.7 Support for Alternative A

The commenter's opinion that Alternative A is the least environmentally damaging alternative is noted. The Department considers the Preliminary General Plan the environmentally preferred alternative as stated on page 4-5 of the Preliminary General Plan and Draft EIR. It should also be noted that the project sponsor is not required by CEQA to choose the alternative with the fewest significant environmental impacts. The purpose of the EIR is to provide information to the project sponsor regarding the potentially significant effects that could result from the implementation of the General Plan and not to determine the end result.

8.8 Detailed Mapping of Roads Problems

See response to Comment Number 1.4 which clarifies that CEQA allows use of a tiered environmental evaluation, starting with a more general programmatic EIR, then moving to more specific project level EIRs. Also see response to Comment Number 8.3.

8.9 Sonoma County Water Agency fisheries monitoring

Regarding the requests for additional information regarding steelhead occurrence or distribution and Sonoma County Water Agency monitoring; CEQA Guidelines state in Article 13, Section 15204: CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

The detailed information requested by the commenter is beyond the scope of this 20-year or more General Plan. The General Plan identifies general issues to consider during project-level evaluation and provides goals and guidelines to direct future Department actions. The Preliminary General Plan and Draft EIR state that the main watercourses that flow within the park (Sonoma Creek, Santa Rosa Creek, and Calabazas Creeks) support spawning habitat for steelhead trout and that spawning habitat is susceptible to the deposition of sediment, which may be occurring within the park. Guidelines in the General Plan direct the Department to avoid or reduce sedimentation in the creeks; avoid, reduce or minimize potentially significant impacts to special-status species; and monitor and evaluate the effectiveness of actions (WQ-1, WQ-2, WQ-8, BIO-21).

To address the commenter's concern that this information regarding water quality be accessible to decision-makers, WQ-1 will be modified as follows to provide further guidance to the reader about the more specific data collected by the Sonoma County Water Agency that can be used in the planning, environmental evaluation, and monitoring effort at a project level:

WQ-1: As time and funding allow, identify existing sources of pollution/sedimentation in the park's creeks and take appropriate, source–specific abatement actions. Monitor and evaluate the effectiveness of the actions and make any necessary changes based on the evaluation. The Sonoma County Water Agency (Fisheries Division) measurements of water and fish levels could provide baseline data for this monitoring effort in the Santa Rosa Creek watershed.

The Surface Water section on page 2-27 and the Aquatic Habitat Values section on pages 2-36 to 2-37 have also been modified as follows:

Surface Water pg. 2-27

Hood Mountain Regional Park contains approximately one-half mile of the North Fork and 0.6 miles of the Main Fork of Santa Rosa Creek. Mature riparian woodland

borders the creek through the park. As described in the biological resources section, steelhead trout have been observed in the headwaters of Santa Rosa Creek since 1844 and, despite urbanization and human disturbance, adult steelhead are still seen. The Sonoma County Water Agency (Fisheries Division) conducted a series of Fisheries Enhancement Projects (FEP) on Santa Rosa Creek. Two landslide repair projects are designed to reduce sediment flowing into upper Santa Rosa Creek. Improvements to the road crossing, which provides access into the northern portion of Sugarloaf Ridge State Park and Hood Mountain Regional Park, will eliminate a concrete drop structure that limits fish passage.[7]

In 1997, representatives of the California Department of Fish and Game and the National Marine Fisheries Service inspected the North Fork and observed both good riffle pool development and pools deep enough to provide rearing habitat for salmonids in low-flow summer months. However, the North Fork also exhibited a layer of fine sediments (fines) covering the gravels, cobbles, and boulders such that salmonid eggs would have little chance of survival. The fines may originate from several sources, including degrading road cuts that parallel a third of the length of the North Fork (Circuit Rider Productions, 1999, pg. 12).

Aquatic Habitat Values (pp. 2-36–37)

The main watercourses that flow within the General Plan study area are Sonoma Creek, Santa Rosa Creek, and Calabazas Creek. These watercourses support relatively pristine stands of native vegetation and spawning habitat for steelhead (*Oncorhynchus mykiss*). Steelhead have been observed in Sonoma Creek within Sugarloaf Ridge State Park. Chinook salmon (*Oncorhynchus tshawytscha*) occur in Sonoma Creek in Adobe Canyon about one-half mile below the boundary of the park. Adult salmon have been observed in this area for two years, and juveniles were observed last year. The Sonoma County Water Agency has been conducting fisheries enhancement projects in the upper Santa Rosa Creek Watershed (see previous discussion regarding surface water)

For spawning, steelhead and chinook salmon require relatively cold water and gravels that are located in riffles. These areas provide the oxygen concentration necessary for successful development of the eggs. The spawning areas are especially susceptible to the deposition of sediment. Sediment prevents oxygen from reaching the eggs and can destroy a spawning area. Erosion is occurring along a portion of the headwaters of Sonoma Creek and may affect spawning habitat. Also, maintenance of summer stream flows is especially important in maintaining summer rearing habitat for salmonid species. The Sonoma Ecology Center is currently preparing a water quality control plan for the Sonoma Creek Watershed.

[7] Sonoma County Water Agency, Fisheries Enhancement Program Annual Reports 1997-2001.

8.10 Citation

We wish to acknowledge your contribution to the report cited. The following citation, located on page 2-28, will be added with your name as follows:

Table 2-1
Sonoma Creek Stream Flow Data

	LOW	HIGH
Total annual discharge	1,000 af (1977)	114,000 af (1956)
Creek runoff in response to precipitation	15 inches (1977)	70 inches (1967)
Flood magnitude		8,800 cfs (December 1955)
Low flow	< 3 cfs (May – September)	

Sources: Sonoma Ecology Center and USGS

Note: Creek flows respond dramatically to precipitation. In general, more rain produces more runoff, but a higher percentage of precipitation becomes runoff in wet years than in dry years. In 1956, an estimated 58% (34 inches) of rainfall became runoff. In 1977, only 2% (0.3 inch) of rainfall became runoff. Thus, the amount of runoff in any given year is very sensitive to the amount of rainfall in that year. Stream flow is the water left over after precipitation has supplied the demands of evaporation from vegetation, soil, and water bodies. In a dry year, most and sometimes nearly all rainfall goes to meet evaporation and transpiration demands, and thus there would be very little stream flow. For example, in 1977, the driest year of the record, no flow was recorded at the gauge in most of June and all of July, August, and September (David Leland for the Sonoma Ecology Center, 2003).

af = acre-feet

cfs = cubic feet per second

8.11 US Geological Society

The following paragraph, located on page 2-28, will be revised as follows:

> The U.S. Geological Survey (USGS) maintained a stream flow gauging station in Sonoma Creek from 1955 to 1981. It was located at the southeast corner of the Boyes Boulevard bridge from 1955 to 1967 and then relocated to the Agua Caliente Road bridge over Sonoma Creek until its discontinuation in 1981. USGS has since reinstalled the gage on Sonoma Creek, at the Agua Caliente Road crossing.

8.12 Creek usage by salmonid species

See response to Comments 8.3 and 8.9. The Preliminary General Plan and Draft EIR state that the main watercourses and their tributaries within the park (Sonoma, Santa Rosa, and Calabazas Creeks) support spawning habitat for steelhead trout and that spawning habitat is susceptible to the deposition of sediment, which may be occurring within the park. This is adequate information for the scope of this General Plan and programmatic EIR. The information requested by the commenter would be developed as needed at a project-level for implementation of guidelines directing adaptive management techniques to minimize the potential degradation of water quality from human use within the park.[8]

[8] In its ongoing effort to reduce sediment, State Parks is applying for a grant from San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) to improve water quality of runoff from Adobe Canyon Road within the park to Sonoma Creek. On Jan 29, 2004 Park staff and RWQCB environmental scientists evaluated roadway conditions and culverts to determine best methods for improving salmonid habitat.

8.13 Well Characteristics

The detailed information on well characteristics requested by the commenter is beyond the scope of this General Plan (See response to Comment 8.3). The General Plan identifies general issues to consider during project-level evaluation and provides goals and guidelines to direct future Department actions.

When the Draft General Plan was written, the capacity and sustained yield of the existing well were not known. However, we are now aware that the well produces over 30,000 gallons per day. To address concerns of the commenter regarding water use and the well capacity, the following very preliminary calculations are presented.[9] The demand, based on the very preliminary estimate cited below, is approximately 15 percent of the production capacity of the single well currently drawing on the aquifer. Given the projected maximum demand and production capacity of the well, water quantity downstream is not likely to be diminished, particularly since the well has proven a sustained capability. Further evaluation of this issue at the project level will be required.

The potential effects of water withdrawal would be the subject of a project-level environmental review, which would have to study the potential effects of water withdrawal on stream flow, as described in Guideline PROJ-4 (as modified) and the proposed guideline WQ-15. In addition, BIO-21 directs the Department to develop the appropriate project-level CEQA documentation, including environmental evaluation and mitigation measures necessary to avoid, reduce or minimize potentially significant impacts to special-status animal species, including steelhead trout and salmonids which may be affected by reduced stream flow.

To further clarify the commenter's concern regarding maintaining adequate stream flow for salmonid habitat, paragraph 2 titled, Water Supply/Groundwater, on page 4-9 will be modified as follows:

> … Feasibility studies, including water supply availability would assess potential effects of increased water use to evaluate potential effects to stream flow to minimize impacts aquatic habitat, especially salmonids. These studies would be conducted in conjunction with detailed project design and construction (Guideline PROJ-4). Additional environmental review would occur at a project level, and appropriate mitigation measures to avoid or minimize impacts to the groundwater source or changes in stream flow would be developed at that time.

8.14 – 8.23 Comments on specific Water Quality Guidelines

Comments 8-14–23 are addressed in the following revisions to some of the Water Quality guidelines (WQ) located on pp. 3-6–8.

[9] To estimate the demand on the well, consider all 4 persons per campsite site at all 70 sites projected for Adobe Canyon (there are 50 now). This would be a maximum of 280 showers/day. Estimating 6 min./shower x 2.5 GPM ea. = 4,200 gallons per day for showers.

8.14 WQ-1

See response to Comment 8.3. WQ-1 is a general guideline stating the Department's intent to reduce pollution and sedimentation from existing sources. The other Water Quality guidelines describe some potential actions that could be taken to meet this intent. The type of abatement actions to be used in a specific situation to comply with the intent of this guideline would be left to the discretion of the qualified park staff, in compliance with other guidelines for water quality and resource protection provided in this General Plan. The specific type and extent of monitoring would be determined at the project level, according to the specific needs and goals of the project. Post-project monitoring and evaluation as directed by WQ-1 would be used as needed to achieve the desired water quality goals.

Specific abatement actions are recommended by the California Stormwater Quality Association's handbook to control water quality during and after construction. Best Management Practices or BMPs are provided in their construction handbook. These practices are used during the construction of new buildings, roads, trails, etc. to prevent erosion and runoff of stormwater that may carry pollutants or suspended soil particles. The BMPs protect water quality through both temporary measures used during construction and more permanent post-construction measures. Such measures may include revegetation and slope protection and drop inlet filter systems to handle potentially polluted runoff. These are developed in detail for construction bid packages and project-level EIR documents. These are reviewed in a separate Stormwater Pollution Prevention Plan for projects over one acre in size. Additional coordination with the Sonoma-Marin Resource Conservation District, Sonoma County, and the RWQCB for sampling protocols could occur during the project-level review process.

Monitoring of erosion problems could include survey lines or points that are periodically re-surveyed, use of photo points for documentation, etc. Protocol for road and trail surveys and determination of erosion potential are available from the California Geological Survey and private companies such as Pacific Watershed Associates (Handbook for Forest and Ranch Roads).

8.15 WQ-2, Encourage avoidance rather than minimization

Guideline WQ-2 provides general direction to park staff to make efforts to reduce pollutant loads in surface runoff. This applies to sedimentation and pollutant runoff from existing park facilities, from natural erosion, and during the design, construction, and operation of future facilities. Guideline WQ-2 will be modified to emphasize avoidance where possible.

WQ-2: Avoid or minimize to the extent practicable deposition and discharge of sediment, debris, waste, and other pollutants into surface runoff, drainage systems, surface water bodies, and groundwater.

8.16 WQ-4, Define setback reference point

Guideline WQ-4 will be changed to include the insert defining the reference point.;

WQ-4: During the planning and design of area-specific projects, where feasible incorporate a minimum setback of 50 to 100 feet from the bankfull width of the stream or creek channel to minimize the deposition and discharge of sediment and other pollutants into streams and creeks. When the setback is less than 100 feet, incorporate stormwater management measures such as planting native vegetation to slow runoff entering the stream.

8.17 WQ-6, Use of bankfull flow rates

Guideline WQ-6 will be changed to include an analysis of a range of water flows.

WQ-6: Evaluate new area-specific projects during the planning and design process to ensure they do not increase water flows (from bankfull to full flood stages) in the creeks that would result in downstream flooding or cause localized bank erosion.

8.18 WQ-7, Water Quantity

The Water Quality section in Chapter 3 has been re-titled Hydrology/Water Quality. The goal for this section will be modified as follows:

Goal

- Protect and restore the water quality in the Sonoma, Santa Rosa, Bear, and Calabazas Creek watersheds, and to the extent feasible, provide for adequate stream flow is available to continue to support steelhead and Chinook salmon spawning and rearing habitats.

8.19 WQ-8, Best management practices (BMPs)

See response to Comment 8.3. Guideline WQ-8 provides examples of principal control measures (best management practices) to be considered on a project level and refers the reader to the region's water quality control plan for water quality protection standards. This level of description is appropriate for the scope of the General Plan. Also reference BMPs in response to Comment 8.14.

8.20 WQ-9

Guideline WQ-9 will be modified as follows to provide a list of potential control measures for consideration.

WQ-9: With development of horse-related facilities, implement measures to reduce transport of pollutants from animal waste to the creeks. These measures[10] may include, but will not be limited to, the following:

[10] Council of Bay Area Resource Conservation Districts (no date). *Horse Owners Guide to Water Quality Protection.*

- Adhere to Guideline WQ-4 when siting new facilities;
- Clean up manure on a regular basis, especially during wet weather;
- After clean up, during the arid summer, water areas where horses frequently deposit manure. Watering maintains the moist environment bacteria need to decompose residual waste;
- Store horse waste in an impervious surface and under cover;
- Separate barnyards, corrals, and manure storage areas from streams with buffer strips of vegetation to filter sediments and absorb nutrients in runoff; and
- Use grassed ditches, berms, or subsurface drains to divert "clean" runoff around barns, manure storage areas, and corrals.

Guideline ADOBE-22 specifically addresses the reduction of animal waste pollutants from the existing horse barn in upper Adobe Canyon. The Draft EIR evaluates potential impacts resulting from implementation of the General Plan. Impacts from existing facilities are not the subject of this EIR.

Guideline ADOBE-22 has been modified to reference the newly-listed control measures identified in Guideline WQ-9:

ADOBE-22: Implement measures to reduce transport of animal waste pollutants from the horse barn and equestrian corrals to Sonoma Creek (see WQ-9).

8.21 WQ-10

The detailed information on best available septic technology requested by the commenter is outside the scope of this 20-year and beyond General Plan (see response to Comment 8.3). The General Plan identifies general issues to consider and provides goals and guidelines to direct future Department actions.

8.22 WQ-11

The commenter has misinterpreted Guideline WQ-11 as an indication that there are existing widespread septic system problems. The intention behind the guideline is to provide flexibility in the future for park staff to consider development of a wastewater treatment system if deemed appropriate in the future. To clarify this, Guideline WQ-11 has been modified as follows:

WQ-11: Consider development of a wastewater treatment system if widespread septic system problems occur that are a health concern and cannot be addressed by on-site maintenance and management programs.

Ranger observations of restrooms and septic leach fields, and water quality tests could provide initial indications of septic problems. Further studies would follow to determine the nature and severity of the problem. See response to Comment 8.3.

8.23 WQ-12

The General Plan provides direction to park staff to take actions in the park over the next 20 years or beyond. WQ-12 is a general guideline indicating that the restoration of degraded riparian and aquatic habitat is desirable. However, the constraints of financial resources within the Department may limit the extent to which this guideline may be implemented over time. Thus, 'to the extent feasible', is included in the guideline.

The interpretation of the term "a reasonable time" is left to the discretion of the park resource ecologists or other qualified staff to meet project goals for the specific area restoration.

8.24 Environmental quality indicators for water quality

The General Plan provides an understanding of significant resource values as the basis for addressing general planning issues, and establishes a framework and direction for more focused resource planning that occurs beyond the approval of the plan. Collection of more detailed resource data is appropriate and necessary in subsequent planning phases. When the project scope is fully defined, potential impacts can be analyzed and appropriate mitigation measures identified.

Table 3-1 Carrying Capacity will also be modified to include additional water quality indicators referencing adequate stream flow to support steelhead and Chinook salmon habitats, control of sediment during management activities, and the use of turbidity as a monitoring measure, as follows.

Table 3-1
Carrying Capacity

GOAL	DESIRED OUTCOME / STANDARD	ENVIRONMENTAL QUALITY INDICATORS[a]	POTENTIAL MONITORING ACTIVITIES
WQ: Protect and restore the water quality in the Sonoma, Santa Rosa, Bear, and Calabazas Creek watersheds	Water quality in the park's creeks exceeding established standards and forming the baseline for all water quality evaluations downstream	• Adequate stream flow is available to continue to support spawning habitat for steelhead and Chinook salmon. • Bank erosion where roads and trails are known to have caused sedimentation is minimized • Discharge of sediment from road and trail management activities is minimized. • Grassy swales and other erosion and water quality control measures after storm events properly function • Septic or other wastewater treatment systems properly function • Regularly monitor turbidity in water courses to evaluate changes in environmental conditions.	• Measure water well production rates and evaluate ground water levels with stream flows. • Staff observations during day-to-day operations • Periodic steelhead surveys • Periodic testing of water quality with the Sonoma Ecology Center or other organizations • Evaluation of park access roads for erosion and sediment control • Regularly monitor water turbidity.

8.25 Impacts to Water Quality

See response to Comment 8.3.

8.26 Water Supply

See response to Comments 8.4 and 8.13. The commenter is requesting a specific evaluation of the impacts of increased level of water use from a new restroom and showers on water supply availability and reliability, and on the impacts of increased groundwater use on stream flow in the affected streams. The commenter states that he believes the Department has the necessary information to provide the specific analysis requested. However, the analysis requested is not as simple as portrayed by the commenter.

First, it should be clarified that the General Plan provides a vision for the park for the next 20 years and beyond, and is not proposing the immediate development of all of the specific components identified. The General Plan identifies some desired recreational facilities, the construction of which could be allowed in the future if they meet the intent of the Park-wide goals and guidelines and comply with relevant standards and regulations to protect the environment.

The specific plans for any new facilities using potable water have not been developed and are not provided, as that level of detail is beyond the scope of a general plan. The General Plan

identifies the potential allowance of a new restroom facility with showers in the campground area of upper Adobe Canyon, and the potential for the development of new restrooms at the Observatory, Visitor Center, Los Alamos Road Parking lot, and Nunns Canyon Road parking lot. However, specific details have not been developed for any of these potential projects.

As such, the specific number of running-water toilets, showerheads, sinks, water fountains, hose bibs, or other water features is not known at this time. In addition, the exact location of the potable water facilities or when they would be developed has not been determined. Nor is it known whether potable water would be used in the toilets, or if the toilets would be compostable or would use reclaimed water. The source of the water to be used in these facilities has not been determined. It is not known whether all new water facilities would draw off of the existing water well in Adobe Canyon, use the previously developed spring water source in Adobe Canyon, require development of new groundwater wells, or use water piped or trucked in from an outside source, or from a combination of various sources. Any or all of these options would be considered during project-level planning and design.

Because the size, location, and water source for all potable water facilities has not been determined at this time, it is also unclear which watersheds (including surface and ground water) would be affected by the increased water use, and to what extent. Because neither the source nor the amount of water needed has been determined, it is extremely difficult to assess the potential cumulative impacts to groundwater levels, stream flow, or salmonid habitat. Such analysis is appropriate to address at the project level, when more detailed information is available.

Nevertheless, the Draft General Plan acknowledges that the availability of the existing source of potable water for the park—groundwater supplied by the well in Adobe Canyon—may not be sufficient to supply a restroom with showers or other additional water demand. Therefore, a feasibility study and environmental review should be conducted at the project level when the information needed to conduct a thorough analysis is available. This is an appropriate level of detail in light of the nature and breadth of the proposed General Plan and programmatic EIR.

8.27 Unavoidable significant effects

See response to Comment 8.1. As stated previously, it is not guaranteed that all of the proposals allowed in the General Plan will be deemed feasible after the completion of project-level EIRs. In some cases, the facilities allowed by the General Plan may be excluded upon site-specific evaluations. Because future projects would be required to meet the standards and performance measures to reduce potential impacts to a less-than-significant level, as prescribed in the guidelines of the Preliminary General Plan and Draft EIR, it can be determined that the Plan would not result in any unavoidable significant effects.

8.28 Significant irreversible effects

See response to Comment 8.27.

8.29 Cumulative Impacts

See responses to Comments 8.4, 8.5, and 8.26.

Letter 9

RECEIVED

JAN 2 9 2004

NORTHERN SERVICE CENTER

January 24, 2004

Mr. Wayne Woodroof
State General Plan Mgr.
California Dept. of Parks & Recreation

Re: Sugarloaf RidgeState Park

Dear Mr. Woodroof:

In 1996 Sonooma Creek was listed as impaired for excess sediment / siltation. Suspected sources were agriculture, construction, urban run-off, and roads.

In the fall of 2002, data collected from stations in Sonoma Valley showed that Adobe Creek in Sugarloaf Ridge State Park was the major source of sediment / siltation. The long unpaved access road into the Park is immediately adjacent to Adobe Creek, and would seem to be the cause of the excessive sediment load. Every vehicle entering or leaving the Park during the dry high-traffic season of the year kicks up "rooster-tail" clouds of dust that settles below in Adobe Creek itself, and are also sent along the creek and into Sonoma Creek.

Could future plans for the park include funding for surfacing the road with blue shale or a similar permeable material? Park visits should be limited, not increased and encouraged, until this TMDL problem is mitigated. **9.1**

Dead tree removal due to Sudden Oak Death Disease, and it's costs, should not come as a surprise. It is well known and well documented that the disease is most prevalent along trails and in campgrounds. The more human intrusion, the more the disease spreads, even where professional "experts" are studying and researching the disease. Fire danger due to increased fuel loads in an already high-risk fire area, and increased potential for spread of the disease, preclude the option of simply leaving the dead and diseased trees in place. Rather than adding more campsites, please consider closing campsites until a cure or feasible mitigation can be implented to stop the spread of Sudden Oak Death Disease. Parking could be limited to the Ranger's Station area and where the dead and diseased trees have already been removed. There should be a boot cleaning /disinfecting bath next to the Ranger's Station, similar to the tire baths that are required for entry onto the pemises of poultry producers, in order to prevent the spread of disease. **9.2**

These mitigation suggestions may not be glamorous or immediately pleasing to some potential Park visitors, but need to be funded now in order to ensure the enjoyment and longterm health of Sugarloaf State Park and The Sonoma Valley.

Other parks - "loved to death" - by becoming too popular, but without respectful treatment of the ecology of the park itself, should be a lesson that prevention is far more effective than attempts at cure. As funding and staffing are becomimg even more limited, so should our financial and human resources be used even more judiciously.

Thank you for your consideration of these issues in planning for the future of Sugarloaf Ridge State Park.

Lu Benson

17237 Seventh St, East - Sonoma Ca. 95476

Response to Letter 9

From: Mr. Lu Benson, City of Sonoma Resident.

9.1 Adobe Canyon Road Parking

Adobe Canyon Road is, in fact, a paved road. From the park entrance, the road climbs out of the canyon near Adobe Creek, and conditions such as eroding cut slopes and the need for stabilization in ditches suggest that the road contributes to increases in stream sediment in Sonoma Creek.

Circulation Guideline CIRC-2 (pp. 3-19–20) will be modified to recommend the correction of Adobe Canyon Road issues as follows

CIRC-2: Improve and maintain primary visitor access roads to minimize adverse effects on the environment and to safely accommodate expected visitor use. Pay special attention to use by vehicles pulling horse trailers.

- Identify areas for erosion control, stabilization, and reduction of sediment causing conditions.
- Following bullets remain the same.

Identification of areas for stabilization would initiate the process to reduce sources of sediment into Sonoma Creek. The District is aware of the Adobe Canyon Road stabilization and sedimentation problems and has sought funding to correct the problem. Please also see response to Comment 8.12.

9.2 Prevention and control of the spread of Sudden Oak Death Disease

The spread of Sudden Oak Death Disease and the control of its spread are of concern to the Department, and steps are being taken to control its spread. While control of this disease is an important issue, it is not under the purview of the General Plan. It is an issue that is part of a specific resource management plan.

Letter 10

RECEIVED

JAN 2 9 2004

NORTHERN SERVICE CENTER

Jan. 26, 2004

Wayne Woodroof, Manager
Statewide General Plan Program
Calif. Dept. of Parks and Recreation
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 95814

Re: Sugarloaf General Plan and Draft EIR

The undersigned residents of Nelligan Rd. find that the subject Draft EIR is inadequate in that:

1) The "mitigations" for Nuns Canyon Rd. are lacking in specifity. Indicating that the Parks Dept. will work with the County and other agencies to establish acceptable measures is meaningless until details are provided. **10.1**

2) It fails altogether to cover impacts on adjoining Nelligan Rd. These include congestion and, most importantly, safety as affected by the increased traffic volume generated by the Beltane quarry entrance and related facilities. **10.2**

We would like to add our support to the more exhaustive comments included in Mr. Steve Perry's letter of Jan 26.

In view of the obvious deleterious impact of the Beltane quarry project on the surrounding area, details of which have been outlined in numerous letters and e-mails to the Parks Dept., and the failure of the Draft EIR to cover these relevant issues, we urge that a new EIR be undertaken - one eliminating the Nuns Canyon access. This would be in keeping with the Parks Dept.'s initially stated objective to develop only in already developed areas. **10.3**

[signature]	ROBERT G. LOPEZ	P.O. BOX 516 GLEN ELLEN, CA 95442
[signature]	GARY BOTTONE	P.O. BOX 516 GLEN ELLEN, CA 9544
[signature]	PhyLiss R. Kirk	572 First St W. Sonoma, Ca 95476

Response to Letter 10

From: Mr. Robert G. Lopez, Mr. Gary Bottone, and Ms. Phyliss R. Kirk, City of Glen Ellen and City of Sonoma Residents.

10.1 Mitigations for Nunns Canyon Road

The General Plan is a broad policy document that sets the direction and provides the vision for the park's management and development. The plan is not intended to designate detailed facilities with specific size, design, and locations. Therefore, details regarding the specific actions to be taken by the County and the Department to establish acceptable measures for Nunns Canyon Road are subject of a project-level CEQA analysis and are not a part of the General Plan or its EIR.

10.2 Nelligan Road Safety

Please see the following set of responses, specifically response 11-7.

10.3 Beltane Quarry project issues

The objective of the Department is to place future development in existing or previously developed areas. The Beltane quarry is a previously developed site and the Department is proposing to reuse the disturbed property. The quarry is close to Highway 12, and is well situated to provide access to Park lands. Project development plans will evaluate the needs of Nunns Canyon Road and Nelligan Road at such times when funds become available to develop the quarry.

Letter 11

Steven J. Perry
13975 Arnold Drive
Glen Ellen, CA 95442
Phone: (707) 935-0270 Email: acpsjp @ juno.com

January 26, 2004

Mr. Wayne Woodroof
Manager, Statewide General Plan Program
California Department of Parks and Recreation
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 95814

Subject: Sugarloaf Ridge State Park General Plan and Draft EIR

Dear Mr. Woodroof;

Section 4.4.5, Transportation/Traffic, and Section 4.5.5, Cumulative Impacts of the Sugarloaf Ridge State Park (Sugarloaf) Draft Environmental Impact Report (DEIR) are deficient and require further studies and stronger mitigation. My evaluation of this topic is not exhaustive since the act of finding so many points begging evaluation produced an exhaustion of both time and energy on my part. As a result, my focus was limited to the Sections 4.4.5 and 4.5.5 with specific focus only on the Nuns Canyon access. The primary issues supporting my conclusion are detailed in the following sections; **11.1**

CRANE TRANSPORTATION GROUP TRAFFIC STUDY

The Sugarloaf DEIR relies heavily, if not 100%, on the February 2002 Crane Transportation Group traffic study (Crane Study) created for the Sonoma Country Inn (SCI) project proposed nearby. While it is laudable to utilize existing information rather than spending great sums to reinvent the wheel, it is critical that the information being utilized is complete and accurate.

The Sugarloaf DEIR suggests that the methodology is approved by Sonoma County, but fails to indicate that the Sonoma County Planning Commission had significant concerns with the Crane Study. Appendix A is a recap of the comments on traffic impacts and other comments gleaned from the Sonoma County Permits and Resources Management Department (PRMD) files on the SCI project. While the document contains public comments about the study, your attention is directed to pages 1, 3, 5 and 6 which reflect critical comments by Planning Commissioners Fogg, Bennett and Furch. With Commission's concerns ranging from cumulative assumptions, growth rate assumptions, the failure to include Hood Mountain and Sugarloaf State Parks entrance projects it is clear that they did not accept and approve the Crane Study. In fact, they instructed PRMD Staff to address the deficiencies noted, both by oral comments or written **11.2**

communication. A revised study addressing these issues is in progress and will be subject to examination by the Planning Commission prior to any approval at the Sonoma County level. Therefore it is inappropriate to use the Crane Study, with the suggestion that it was approved by Sonoma County without addressing ALL the comments and criticisms received on the subject during evaluations of the Sonoma Country Inn project.

I1.2 cont.

GROWTH ASSUMPTIONS

The discussion of Traffic Volumes in the DEIR indicates it is appropriate to utilize a growth rate of 2.4% based on the Crane Study for the SCI project. There is little analysis or discussion in the Sugarloaf DEIR to support utilizing this rate. Planning Commissioner Furch has also questioned growth rates during Sonoma County's review of the traffic study, Appendix A, Page 1, Comment #112. The Sugarloaf DEIR indicates that recent studies showed peak-hour growth rates of 1% to 3% in the area. How does this square with traffic counts from the California Department of Transportation (CDOT) website traffic counts, reflected in Tables I & II of Appendix B. Table IV of this Appendix depicts the percentage increase in Peak Hour, Peak Month and Average Annual Daily Traffic (AADT) counts reported by CDOT. Increases in Peak Hour traffic for the measurement points along Highway 12 between Adobe Canyon and Trinity Roads indicate Peak Hour volume has increased between 29.2% and 40.0% from 1998 to 2002. Clearly this average annual rate of increase is greater than the 3% suggested in the DEIR. There is no evidence demonstrating, other than exercise of a judgment call, that the lower rates used in the Crane Study are appropriate for future predictions. This is especially true when considering cumulative impacts of past and future projects, addressed later in this document. Lest we think CDOT's Peak Hour estimates are out of line, we can look at both Peak Month and AADT increase for the same area and time frame; Peak Month increases range from 23.7% to 37.1% and AADT increases range from 23.1% to 37.1%.

I1.3

ROADWAY LEVEL OF SERVICE

The Sugarloaf DEIR indicates on page 4-21, "There would be a significant cumulative impact if operation of a state highway is worse than LOS C in the base case, or if projected future peak-hour cumulative traffic volumes would cause the operation to become worse than LOS C." Unfortunately, the DEIR doesn't address the Highway 12's roadway level of service but rather addresses level of service at various intersections. This EIR must address the roadway level of service for Highway 12 to be a fair and complete evaluation of the plan. Fortunately, the Crane Study did address this issue in the SCI projects DEIR on pages 5.2-14 through 5.2-19, attached as Appendix C, pages 1 through 6. The results of the analysis, SCI DEIR page 5.2-16, indicate all analyzed segments of SR12 operate at LOS E conditions during all three analyzed peak hours. This is a significant impact that wasn't appropriately identified in the Sugarloaf DEIR and remedied with appropriate mitigation plans. Such plans should address the financial implications as well as generally recognized desires of Sonoma Valley citizens.

I1.4

PEAK TRAFFIC PERIOD

The Sugarloaf DEIR indicates, "The controlling factor in this analysis is weekend peak-hour traffic conditions on State Route 12 (Sunday between 4:30 and 5:30 p.m.).

I1.5

This time period, however, does not coincide with the peak hours of park access or egress, which are earlier in the day." The Crane Study as depicted in the SCI DEIR portray the Sunday from 3:30 to 4:30 PM as the "Time of weekend afternoon traffic flow peak and maximum outbound flow from a weekend special event." on page 5.2-9, attached as Appendix D. The Sugarloaf DEIR needs to re-confirm the true Sunday peak traffic period and identify any impact the Sugarloaf plan might cause.

Furthermore, there is no evidence that any potential impact was analyzed or measured for weekdays during the heavier summer tourist season to test the plan's impact on weekday summer peaks. The summer period features not only the ambient peak levels experienced throughout the year, but new peak levels associated with tourism and the wine industry activities that are likely to coincide with park visitor patterns. This important potential impact needs to be analyzed.

11.5 cont.

BASE CASE INTERSECTION OPERATION

Under base case conditions, with the previously challenged growth rates, both Adobe Canyon and Nuns Canyon Roads would experience LOS F for westbound approaches to Highway 12, primarily left turns on to the highway. The DEIR indicates the Adobe Canyon failure would be mitigated by General Plan Guideline CIRC-3, concerns about Guideline CIRC-3 discussed later.

The Nuns Canyon intersection is portrayed to suffer "no significant impact" since the projected additional delay is 1.8 seconds, below the County's "5-second" impact threshold. No measurement is made against the County's alternate "added traffic" threshold. That threshold requires a finding of significant impact if 30 or more project vehicle trips are added to an intersection with on or more movements operating at LOS E, or 20 or more project vehicles added to an intersection with one or more movements operating at LOS F.

11.6

The DEIR doesn't measure indicate trips generated for Nuns Canyon, only Sunday Peak Hour trips; Figure 4-4 indicates 14 new trips turning onto and off of Nuns Canyon while Figure 4-2 indicates a total of 32 new trips impacting the intersection of Nuns Canyon Road and Highway 12. Why was this intersection not declared to have a significant impact, thus requiring appropriate mitigation? It appears to meet or have the potential to meet the added trip threshold. Is Nuns Canyon doomed to be one of many FAILED stop-sign controlled county road intersections along Highway 12 identified by the Crane Study and reported in either the SCI or Sugarloaf DEIRs?

ACCESS ROADWAYS - NUNS CANYON ROAD

The DEIR describes Nuns Canyon Road as "a one-lane roadway of varying width, poor pavement, and minimal to no shoulder". While the description is correct, it is by no means adequate.

11.7

It fails to mention that between the proposed parking site and Highway 12, it also is the sole feeder and access to another one-lane roadway of varying width, poor pavement, and

minimal shoulder. Nelligan Road traverses approximately 2.5 miles as it winds its way to the top of the Mayacamas Range. Along the way it is the sole access to about a dozen homes, a location that occasionally hosts wedding parties of 100 or more and many hundreds of acres of vineyards. With the primarily agricultural influence, traffic patterns along Nelligan Road vary greatly depending on the rhythm of the seasons, from a great influx of small, private vehicles in the pruning season, to slow moving tractors and equipment during the "sulfuring season" and large tractors or trucks towing gondolas, as well as small private vehicles, during the crush. The traffic patterns, while somewhat predictable, are not well described in terms of averages. Nuns Canyon is the sole access for any emergency services required on Nelligan Road.

Beyond Nelligan Road, Nuns Canyon serves several home sites and a bed and breakfast inn, Au Relais du Soleil, that also advertises its availability for wedding parties on the Internet. Clearly the traffic associated with the bed and breakfast inn will be highly seasonal, both for guests and wedding parties. That seasonality will also coincide with the seasonality of park visitors.

The DEIR does not clearly describe the nature of traffic studies performed to determine current ambient traffic along Nuns Canyon. Given the peak and valley seasonal nature of traffic patterns in the vicinity, it is highly unlikely that the usual statistical approach with a day or two of traffic counts will come close to measuring the true activities, patterns and trends on the road. This is a locale where an additional 1.8 seconds delay is likely achieved by a series of truly long delays averaged out and moderated over time. The DEIR need to portray how well it handled this potential statistical anomaly.

I1.7 cont.

PUBLIC SAFETY

The DEIR indicates Guideline NC-2, criticized in detail in the Mitigation Section below, calls for the California Department of Parks and Recreation (Department) to work with appropriate agencies to establish secondary a secondary access route from the Nuns Canyon Management Zone. As mentioned in the previous discussion on Nuns Canyon many citizens and several businesses are domiciled on Nuns Canyon or along Nelligan Road. Adding vehicles to Nuns Canyon increases the likelihood of an incident that could render the area inaccessible to emergency services or aid. Alternate access to not only the Nuns Canyon Management Zone but also the balance of Nuns Canyon and Nelligan Roads should be a requirement for any consideration of developing a Nuns Canyon access to Sugarloaf, be it consideration of a General Plan element or implementation of a project.

I1.8

CUMULATIVE IMPACTS

Section 4.5.5 Cumulative Impacts has been and continues to be a major concern regarding the Crane Study, be it associated with the SCI or Sugarloaf EIR. Many of the Cumulative Projects listed on DEIR Table 4-6 have Description/Note explanations suggesting they were not considered in developing traffic growth rates utilized to project 2005 and 2012 Base Cases.

I1.9

There were no estimates of visitor use for the Hood Mountain Park Plan. Are estimates now available? Surely there were ball park ranges utilized to approach such a park plan. Deerfield Ranch Winery was recently approved with not only 20 events but also 30 private wine tasting events of up to 35 persons. The Mayo Family Winery had an exhaustive traffic study yet there is no notation of the predicted impact. That facility is now open but wasn't fully operational when the Crane Study was published in February 2003. Is the traffic impact included? There were no mentions of traffic impacts for the Chauvet Hotel, Gaige House Inn and Glen Ellen Inn projects. There is no description of potential impacts resulting from the approximate doubling of the Valley of the Moon Children's Home. The St. Francis Winery and Vineyards entry indicates "Event application only". Was the associated event traffic compiled? The 24 unit Kenwood Inn Expansion included traffic increases and requirement for Highway 12 modifications that are yet to be implemented. Was this traffic impact addressed?

The Graywood Ranch Subdivision, listed as a 3 single-family residential units, is actually the companion project to the Sonoma Country Inn project that has significant traffic implications is not listed among the Cumulative Projects. Does the 3% growth rate up to 2005 and 2.4% rate beyond include all the cumulative projects listed plus residential development not generally addressed on the list?

11.9 cont.

During the course of my evaluation, I discovered correspondence from Captain James McLaughlin, Commander of the California Highway Patrol's Napa District expressing concern for cumulative traffic impacts. The February 2002 letter, attached as Appendix E, is in response to the Mayo Winery project, small wine tasting room located on Arnold Drive near Highway 12. The Captain was concerned that the cumulative impact of future projects and proposals could significantly impact Highway 12 from Madrone Road to Trinity Road, the northernmost intersection of the Highway still in the Napa jurisdiction. He also expressed concern about level of service failure at the intersection of Arnold and Highway 12. The Nelligan Road portion of this DEIR is one intersection north of Captain McLaughlin's area of responsibility and it would most important to solicit his input regarding this plan.

Please remember cumulative impacts on traffic were a significant concern of both the public and the Commissioners at the Planning Commission review of the SCI DEIR, which included the Crane Study. Will any modification of the Crane Study be folded into the Sugarloaf DEIR or will this DEIR rely on a study that may have followed an approved methodology but was lacking depth and breadth?

MITIGATION ISSUES

The DEIR indicates Guideline CIRC-2, NC-2, NC-5 and NC-7 will avoid, minimize or compensate for the negative aspects of the traffic associated with placing 40 regular parking spaces and 5 horse trailer parking spaces in the Beltane Quarry.

11.10

CIRC-2 MAY solve these problems however the wording does not require or instill confidence that it will solve problems. Under the Guideline, the Department's

responsibility is to work with Sonoma County Public Works Department for maintenance and repair of Adobe Canyon Road, Los Alamos Road, and Nuns Canyon Road. Simply work with a County agency who's head, Mr. David Knight, recently advised the Sonoma Valley Citizen's Advisory Commission that due to funding and budget issues, his department is now managing the failure of the County's road system. How will a Guideline that doesn't commit funds or require an end result mitigate ANY traffic impact? This Guideline addresses other traffic impacts by requiring the Department to CONSIDER several other traffic and safety related issues but does not require any performance standards. Can we have mitigation without required or expected results of mitigating actions? **11.10a**

NC-2 reads more like the creation of an impact rather than a mitigation. It advocates development of facilities, such as parking, including parking for horse trailers. One could better argue that vehicle, traffic, safety and the environment along Nuns Canyon Road could be enhanced and issues mitigated if the NC-2 took the opposite tact and required that parking not be developed. **11.10b**

NC-5 advocates consideration of widening Nuns Canyon Road or constructing pullouts without damaging the riparian corridor. It further advocates that the Department work with Sonoma County Public Works to improve and maintain Nuns Canyon Road to reduce erosion. Neither of these points REQUIRES the Department to remedy or cause the remedy of any traffic, safety or environmental impacts cause by the introduction of increased vehicle traffic on Nuns Canyon Road. **11.10c**

NC-6's admonition is merely to work with CDF and other jurisdictions to establish a secondary emergency access route for park visitors and residences in case Nuns Canyon Road is block during an emergency. As a mitigation NC-6 is toothless in addressing what could be a very real problem for the residences on Nelligan Road, where options could be both difficult and expensive to develop. There is no commitment on the Departments behalf to fund any such alternatives. While CDF costs would likely be borne by the State, the cost for the other agencies will either fall on the backs of local citizens or alternatives will not be pursued due to lack of funding. This mitigation is sorely lacking in ability to moderate or relieve the potential impact on emergency services. **11.10d**

In general all General Plan Guidelines should be re-evaluated, especially those cited as mitigations for identified impacts, to insure appropriate resources are pledged and appropriate action is required to insure that mitigation can and will take place.

ALTERNATIVES

The issues surrounding the Crane Study and more specifically inadequately identified and mitigated impacts associated with the Nuns Canyon Road access point indicate the Department needs to revise this current DEIR, modify the General Plan to support the DEIR modifications and issue a new DEIR for further public review. Some of the questions concerning core DEIR traffic data may require significant reconsideration of the **11.11**

DEIR and preclude the normal process of editing the DEIR to address public concerns and issuing a proposed final EIR.

Given the DEIR does not adequately address the issues of the Nuns Canyon Road, coupled with the fact that Alternatives A, B and C all include Nuns Canyon Road vehicle access, the only viable alternative under this DEIR as it currently exists is the No Project Alternative. The decision makers should select the No Project Alternative with the option of instructing the Department to further examine, identify and mitigate the Nuns Canyon access issue OR instruct the Department to develop an alternative that does not include vehicle access via Nuns Canyon Road.

I1.11 cont.

COMMENTS ON THE PROCESS

I feel the compelled to share my extreme dismay with the method and timing of the public review of this DEIR. My wife and participated in outreach/planning meetings in Kenwood last summer. In fact, we submitted written comments and suggestions. We later received a mailed copy of the revised plan incorporating the public input. We were interested and we were on the list. Out of the blue, the December 19th issue of the Sonoma Index Tribune published a notice of the park plan and draft EIR review. We had received no notice by mail and the article appeared on week after the documents were filed with the State Clearing House. We the public lost 7 of the 45 days allotted for public comment and review. To top this off, releasing the document less than two weeks before the holiday season showed little regard for the average citizen. While I fully understand that all actions taken were fully in compliance with CEQA, the actions certainly weren't those of an agency honestly and openly seeking the participation of the public in this important process.

I1.12

The public was not well served by the implementation of the public review process of the Sugarloaf DEIR. Frankly, I skeptically wondered "What are they trying to quietly rush through the process?"

Sincerely,

Steven J. Perry

Response to Letter 11

From: Steven J. Perry

These responses address the comments of Mr. Steven J. Perry. His concerns address the traffic impacts of the General Plan.

11.1 Transportation and Traffic

This opinion is acknowledged.

11.2 Use of Sonoma Country Inn Traffic Study

The County of Sonoma received public comments on the Sonoma Country Inn (SCI) DEIR as prepared by Crane Transportation Group. The response document is now available for public review; a public hearing is set for March 18, 2004. The commenter is directed to the SCI EIR Response to Comments at the County of Sonoma PRMD.

11.3 Growth Assumptions

Please see Master Response F in Appendix B (and attachments) prepared in response to the SCI DEIR, referred to in response to Letter 4.

11.4 Roadway Level of Service

Page 4-21. The SCI DEIR provided roadway level of service (LOS) operation evaluation as well as intersection level of service evaluation. As stated by the commenter, it was found that SR 12 currently operates at LOS E for all roadway segments analyzed in the SCI DEIR (i.e., from just east of Warm Springs Road to Pythian Road). Standards for SR 12 are described as follows:

Standards

It is Sonoma County's objective to "reduce congestion on the county-wide highway system by maintaining a 'C' level of service or better on designated arterial and collector roadways" unless a lower level of service is established for the roadway (shown on General Plan Figures CT-2c and CT-2d) or "is determined to be acceptable due to environmental or community values existing in some portions of the County, or the project which would cause the lower level of service has an overriding public benefit which outweighs the increased congestion that would result."[11]

The Sonoma County Transportation Authority's (SCTA) 1991 Congestion Management Plan (CMP) requires that "In no case shall LOS standards established be below level of service E or the current level, whichever is farthest from the level of service A."[12] Level of service E was adopted as the County's minimum standard for the 1991 Sonoma County

[11] Sonoma County General Plan Circulation and Transit Element, 1987, with updates to 1992, Objective CT-2.1. State Route 12 is not shown to have a lower level of service on General Plan Figures CT-2c and CT-2d.

[12] Sonoma County Congestion Management Program, Sonoma County Transportation Authority, 1991.

Congestion Management Program. For the 1993 update of the CMP, the SCTA adopted a flexible approach to LOS standards. The intent of this approach is to create a system that warns jurisdictions of segments that may be approaching an unacceptable level of service in advance of its occurrence. This "early warning system" provides a jurisdiction more time to determine the appropriate solution to relieve congestion. The SCTA requires a formal response from responsible jurisdictions when a roadway segment level of service drops to LOS E, and a deficiency plan must be prepared when a roadway segment level of service drops to LOS F.[13]

Correspondence from Caltrans in April 2001, indicates that the District reviewed the 1995 Sonoma County Congestion Management Program update and recommends "close monitoring of the gradual traffic impacts of local development projects, as mentioned in the 'flexible approach to LOS standards' in Sonoma County Transportation Authority's 1993 [1995] update to the CMP. That said, we have no further comments at this time."[14]

The Initial Study prepared for the Sonoma Country Inn project states that although SR 12 is not designated in the General Plan for a level of service lower than LOS C, existing conditions in the area of the project are at LOS E, and it "appears unlikely that this area could obtain the General Plan–established LOS C without the project."[15] The Initial Study concludes that "it may appear more realistic to assume, as the CMP previously assumed, that LOS E is the established level of service, and that neither the project nor cumulative plus project traffic volumes should increase above LOS E."[16]

The proposed Sugarloaf Ridge Park State Park General Plan project alone, or in combination with projected growth along the SR 12 corridor to year 2012, would not be expected to result in a change in existing level of service on SR 12. With 2012 Base Case plus long-term cumulative project volumes (including projected trip generation from Sugarloaf State Park), future Sunday afternoon peak hour operation would remain within the Level of Service E range. The Sugarloaf Ridge General Plan project volumes would not result in a decrease in average vehicle speeds by 1.0 mile per hour or greater (this is the criterion cited in the County's Significance Criteria).[17] For further discussion of these issues, including ways to improve existing SR 12 operation, the commenter is directed to the SCI EIR analysis.

[13] Sonoma County Congestion Management Program, Sonoma County Transportation Authority, 1995 Update, page 32.

[14] Letter to Denise Peter, Sonoma County PRMD, from Jean Finney, District Branch Chief, representing Harry Y. Yahata, District Director, Department of Transportation (Caltrans), April 25, 2001.

[15] Environmental Checklist Form Sonoma Country Inn, Country of Sonoma, April 26, 2002.

[16] Environmental Checklist Form Sonoma Country Inn, Country of Sonoma, April 26, 2002.

[17] Note that in the SCI analysis by 2012, during a Sunday PM peak hour with concurrent events at all facilities, cumulative volumes result in triggering the County's significance criterion. The analysis illustrates that trips generated by a single project, whether it be a project such the proposed Sonoma Country Inn, or Deerfield Ranch Winery, or Sugarloaf Ridge State Park General Plan, would not be expected to result in traffic volumes that cross the significance threshold; such an impact requires analysis of cumulative traffic generated by multiple concurrent projects.

11.5 Peak Traffic Period

Page 5.2-9. Please see response to Caltrans comment 4-3 regarding the Sunday afternoon peak hour occurring from 3:30 to 4:30 PM, and the correction to the Sugarloaf Ridge DEIR text. The SCI DEIR analysis and the Sugarloaf Ridge State Park General Plan DEIR analysis were both analyzed for peak summer conditions to capture the effects of tourism, including wine industry activities. It is correct that summer Sunday 2012 approach volumes on SR 12 at Adobe Canyon Road are projected to be about 10 percent lower northbound (i.e., 103 fewer northbound vehicles) and about .05 percent lower southbound (i.e., 4 fewer southbound vehicles) in contrast to Friday afternoon peak hour 2012 volumes at the same locations. However weekend visitation numbers consistently tend to be higher than weekday visitation. Therefore, Sunday afternoon is a better peak period reference than a Friday evening. This is the reason for analyzing park activity against an ambient summer Sunday peak hour rather than a summer Friday, or other summer weekday peak hour.

11.6 Base Case Intersection Operation

Page 3-20. This threshold was provided by the County for instances wherein additions of traffic result in a reduction, rather than an increase, in average control delay at an intersection. The referenced threshold comes into play "if the addition of project traffic results in a reduction rather than an increase in average control delay"- see footnote b to Table 4-2, County Unsignalized Intersections Significance Criteria. The project results in an increase in average control delay, thus is not judged by this criterion. DEIR Table D-6 indicates vehicle trips to and from the Nunns Canyon Road parking lot (see Nunns Canyon Road heading in the lower portion of the table).

By 2012 Nunns Canyon Road is projected to have a peak trip generation of 10 outbound and 4 inbound trips attributable to the Sugarloaf Ridge Park General Plan project. Through traffic attributable to the project, added to these 14 trips, would result in 32 new project-generated trips through this intersection. As stated, the project would result in an increase in average control delay, thus it is not judged by the "traffic added criterion"; rather it is judged by the "seconds of added delay criterion." The project is below the "5-second added delay" threshold for intersections with one or more turning movements operating at LOS F.

11.7 Access Roadways – Nunns Canyon Road

Field data compiled for the Sugarloaf Ridge Park General Plan DEIR traffic analysis consisted of intersection counts and geometrics for the SR 12/Nunns Canyon Road intersection. Field observations by a registered traffic engineer of the segments of the roadway proposed to be affected by the Park project provided the basis for descriptions of Nunns Canyon Road. The additional information provided by the commenter for Nelligan Road is informative and will be incorporated into the Existing conditions section of the General Plan on page 2-73, as follows:

> Direct access to the Nunns Canyon Management Zone is provided by Nunns Canyon Road. Nunns Canyon Road is a one-lane, poorly paved roadway extending east from State Route 12. It is stop-sign-controlled on its approach to State Route

12, and a left-turn lane has been provided on the southbound State Route 12 intersection approach. This portion of Nunns Canyon Road is the sole feeder and access to Nelligan Road, also a one-way road of varying width. Nelligan Road traverses approximately 2.5 miles up to the top of the Mayacamas Ridge. Land use is primarily agriculturally influenced, with traffic patterns varying depending on the rhythm of the seasons. Nunns Canyon is the sole access for emergency services required on Nelligan Road.

The analysis identified impacts to Nunns Canyon Road up to and including the proposed parking lot that would serve Nunns Canyon area Park visitors. Response to Comment 4.3 addresses seasonality. As stated, the traffic analysis was deliberately analyzed for summer peak season conditions to capture the effects of tourism and summertime winery activities, which include summer Sunday special event activities at the wineries.

11.8 Public Safety

Page 3-49. This statement of opinion is noted. The commenter appears to be responding to guideline NC-7. The DEIR provides guideline NC-7 to stress the need for an emergency access route into the Nunns Canyon Management Area, other than current access which follows Calabazas Creek. Guideline NC-7 will be reworded as follows:

NC-7: Work with CDF and other jurisdictions to establish a secondary emergency access route for park visitors and residences in case upper Nunns Canyon Road is blocked during an emergency.

The improvements to Nunns Canyon Road recommended in the DEIR would also contribute to improved conditions for emergency egress.

11.9 Cumulative Impacts

Page 4-38. Please see Master Response F in Appendix B (with attachments), regarding analysis of cumulative conditions. Response A addresses projects listed by the commenter (Mayo Ranch Winery, Deerfield Ranch Winery expansion, Chauvet Hotel, Gaige House Inn, Glenn Ellen Inn, Valley of the Moon Children's Home, Kenwood Inn expansion, and others). St. Francis Winery event traffic was addressed in the Friday afternoon peak hour and Sunday afternoon peak hour event traffic evaluation provided in the Sonoma Country Inn EIR. As stated in the Sonoma Country Inn DEIR, the Graywood Ranch single family homes are included in trip generation to and from the access road to Sonoma Country Inn. Master Response F contrasts cumulative analysis by use of 1) general plan buildout projections, 2) growth rate and 3) project-by-project trip generation. It provides an explanation of why the growth rate method was chosen for the Sonoma Country Inn DEIR traffic analysis. It demonstrates (by providing a Friday afternoon peak hour contrasting analysis on a project-by-project basis) that the 3 percent growth rate (to 2005) and 2.4 percent growth rate (to 2012), were reasonable and conservative approaches to analysis of near-term base case and long-term base case traffic conditions.

Regarding increases in visitation at Hood Mountain Regional Park, these are accounted for in the growth rate factors used in the cumulative analysis. Specific numbers have not been released by Sonoma County Regional Parks Department (SCRP) as the park plan has not been developed yet. However, upon recent request, SCRP did provide the following information. "The existing use at Hood for 2003/04 was 33,500 using the Los Alamos Road access point. It would be reasonable to assume that the increase in visitors at the Pythian Road access could be around 30,000. Please note that this is not 30,000 vehicles. We use a factor of 3 visitors per vehicle. So it would convert to approximately 10,000 vehicles/year. [SCRP] will be working with a traffic engineer to determine the impacts that [the] project would add to Highway 12."[18]

11.10 Mitigation Issues

The opinions expressed regarding the efficacy of mitigation are acknowledged. However, the Draft EIR is a first-tier programmatic EIR for the Sugarloaf Ridge State Park General Plan. The proposed General Plan consists of a variety of interrelated components to guide Department actions for the next 20 years or more. The EIR contains an appropriate level of detail in light of the nature and breadth of the proposed General Plan.

As a program-level document, the Draft EIR does not analyze site-specific impacts of future activities at specific locations. Rather the Draft EIR describes generally the sorts of impacts that may occur, and the guidelines describe the standards, best-management practices, regulations, or decision-making processes that would be followed to avoid such impacts.

As required by CEQA, subsequent activities carried out pursuant to the General Plan would be reviewed to determine whether additional environmental analysis must be performed (State CEQA Guidelines 15168(c)). If the subsequent activity will have impacts that were not analyzed in the General Plan Draft EIR, then the Department would have to prepare an initial study analyzing those impacts (State CEQA Guidelines 15168(c)(1)).

Because future projects would be required to meet the standards and performance measures to reduce potential impacts to a less-than-significant level as prescribed in the guidelines of the Preliminary General Plan and Draft EIR, it can be determined that the Plan would not result in any unavoidable or irreversible significant effects. The site-specific conditions present in a particular location would affect the manner in which projects are carried out, as directed by the applicable General Plan guidelines. It is not guaranteed that all of the proposals allowed in the General Plan will be deemed feasible after the completion of project-level environmental review. In some cases the projects allowed by the General Plan may be excluded upon site-specific evaluations.

Regarding the guidelines NC-2, NC-5 and NC-6, these were developed in part to respond to recreation needs and desires as expressed in increased demand of Sugarloaf Ridge State Park

[18] Philip Sales, Sonoma County Regional Parks, February 17, 2004

facilities. Although use of a Nunns Canyon Road parking lot access would result in adding vehicle trips to this roadway, parking lot construction could also facilitate construction of needed roadway improvements, as discussed in the DEIR. The Sugarloaf Ridge Park General Plan DEIR is a programmatic EIR, and does not obligate State or County funds to a specific project. Under the guidance of the General Plan and EIR, State Parks will develop projects consistent with Plan guidelines as funds become available.

11.11 Alternatives

The commenter's opinions are acknowledged.

11.12 Comments on the Process

The commenter's opinions are acknowledged.

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Letter 12

Jeffrey Knaus Owner
1000 Nuns Canyon Road
Glen Ellen, CA 95442

25 Jan 2004

Wayne Woodroof,
Statewide General Plan Program,
California Department of Parks and Recreation,
Northern Service Center
One Capitol Mall, Suite 500,
Sacramento CA 95814

Re Draft EIR of Sugarloaf General Plan

Dear Mr. Woodroof,

As an owner of 1000 Nuns canyon Road I am concerned about your Draft EIR which contains several items that I feel need to be addressed.

1	I f a gate is installed on the road, how on earth will we provide access to vendors, friends, etc.	12.1
2	The road runs very close to Calabasas Creek where several organizations are trying to improve the fish habitat. What would the impact be on the creek with the proposed horses and access to such?	12.2
3	How about the security of the private residents? What would happen in that scenario?	12.3
4	One obvious problem would be the road. It could not accommodate allot of traffic and certainly not allot of 2 way traffic with horses and pedestrians.	12.4
5	What about increased fire danger?	12.5
6	Doesn't CEQA require notice to individual neighboring property owners?	12.6

To me there seem to be several troubling issues that have not or need to be addressed.

Regards,

Jeffrey D. Knaus

Knaus
80 E. Sir Francis Drake Blvd.
Suite 2E
Larkspur, CA 94939

Response to Letter 12

From: Jeffrey D. Knaus, Nunns Canyon Road Resident.

The General Plan is a broad policy document that sets the direction and provides the vision for the park's management and development. The plan is not intended to designate detailed facilities with specific size, design, and locations. Mr. Knaus's comments focus on specifics of potential environmental impacts that could occur in the Nunns Canyon area. Development of parkland facilities in that area would constitute a new project for which a design would need to be developed and a second-tier environmental review (Project Level) would be conducted to evaluate impacts of that specific project.

12.1 Gate across Nunns Canyon Road

Please refer to response to Comment 3.1.

12.2 Restoration of fish habitat on Calabazas Creek and control of horse manure

Please refer to response to Comment 3.3.

12.3 Security of Private Residents

Please refer to response to Comment 3.4.

12.4 Improvements to Nunns Canyon Road to accommodate horses and pedestrians

Please refer to response to Comment 3.5.

12.5 Increased fire danger

Please refer to response to Comment 3.7.

12.6 CEQA Notice to neighboring property owners

Please refer to response to Comment 3.8.

4. Summary of Changes to the Preliminary General Plan and Draft EIR

Chapter 2, pg. 2-27 (8.9 – Sonoma County Water Agency fisheries monitoring)

Surface Water

Hood Mountain Regional Park contains approximately one-half mile of the North Fork and 0.6 miles of the Main Fork of Santa Rosa Creek. Mature riparian woodland borders the creek through the park. As described in the biological resources section, steelhead trout have been observed in the headwaters of Santa Rosa Creek since 1844 and, despite urbanization and human disturbance, adult steelhead are still seen. The Sonoma County Water Agency (Fisheries Division) conducted a series of Fisheries Enhancement Projects (FEP) on Santa Rosa Creek. Two landslide repair projects are designed to reduce sediment flowing into upper Santa Rosa Creek. Improvements to the road crossing, which provides access into the northern portion of Sugarloaf Ridge State Park and Hood Mountain Regional Park, will eliminate a concrete drop structure that limits fish passage.[6]

In 1997, representatives of the California Department of Fish and Game and the National Marine Fisheries Service inspected the North Fork and observed both good riffle pool development and pools deep enough to provide rearing habitat for salmonids in low-flow summer months. However, the North Fork also exhibited a layer of fine sediments (fines) covering the gravels, cobbles, and boulders such that salmonid eggs would have little chance of survival. The fines may originate from several sources, including degrading road cuts that parallel a third of the length of the North Fork (Circuit Rider Productions, 1999, pg. 12).

Chapter 2, pg: 2-26-27 (8.6 – References)

Water Resources

This section summarizes the existing water resources within the General Plan study area. As previously discussed, the area falls within two minor watersheds: Santa Rosa Creek watershed in the northern portion, which is a subunit of the Russian River watershed, and the Sonoma Creek watershed in the southern portion, which drains to San Pablo Bay. Bear Creek and Calabazas Creek flow into Sonoma Creek.

Significant water resources in the General Plan study area were determined through a review of existing documentation; consultation with the Sonoma Ecology Center and Department employees. Analysis and assessment from two documents in particular were used—the McCormick Sanctuary Natural Resource Analysis and Enhancement Plan, prepared by Circuit Rider Productions, Inc. (1999) and the Summary Report, 1998 S.B. 271 Watershed Assessment within Santa Rosa Creek prepared by Pacific Watershed Associates (1998). The former document provided an assessment of erosion problems due to roads, culverts, and gullies. The latter document assessed upland sediment sources and large stream channels and developed an implementation plan for controlling erosion and sediment yield from all lands within Santa Rosa Creek Watershed.

Santa Rosa Creek Watershed

The Santa Rosa Creek watershed encompasses an area of approximately 50,300 acres and includes the headwaters of Santa Rosa Creek, which flows into the Russian River. The northernmost portion of Sugarloaf Ridge State Park and the northernmost portion of Hood Mountain Regional Park lie in the northeastern corner of the Santa Rosa Creek Watershed.

Surface Water

Santa Rosa Creek flows 22 channel miles from its headwaters in Sugarloaf Ridge State Park and Hood Mountain Regional Park to the Laguna de Santa Rosa, then onto the Russian River, which empties into the Pacific Ocean. In addition, a number of intermittent tributaries within the Santa Rosa Creek watershed flow through these areas into Santa Rosa Creek.

Surface water features in Hood Mountain Regional Park include intermittent and perennial streams, seeps, and springs. In the northern portion of the park, these drain into Azalea Creek, North Fork Santa Rosa Creek, South Fork Santa Rosa Creek, and other seasonal drainages. The Main Fork of the Santa Rosa Creek is consistently perennial, while the North Fork of Santa Rosa Creek and Azalea Creek dry up in drought years.

Hood Mountain Regional Park contains approximately 0.5 miles of the North Fork and 0.6 miles of the Main Fork of Santa Rosa Creek. Mature riparian woodland borders the creek through the park. As described in the biological resources section, steelhead trout have been observed in the headwaters of Santa Rosa Creek since 1844 and, despite urbanization and human disturbance, adult steelhead are still seen. The Sonoma County Water Agency (Fisheries Division) regularly measures water and fish levels.

In 1997, representatives of the California Department of Fish and Game and the National Marine Fisheries Service inspected the North Fork and observed both good riffle pool development and pools deep enough to provide rearing habitat for salmonids in low-flow summer months. However, the North Fork also exhibited a layer of fine sediments (fines) covering the gravels, cobbles, and boulders such that salmonid eggs would have little chance of survival. The fines may originate from several sources, including degrading road cuts that parallel a third of the length of the North Fork (Circuit Rider Productions 1999, pg. 12)..

Hydrology Modifications

Road development for powerlines and fire control, in addition to ranching and logging roads, has caused the greatest modification to the natural hydrology. New drainages have inadvertently been created parallel to existing drainages, causing severe erosion problems. Road re-engineering work conducted in 2001 and 2002 remediated these conditions on several miles of degraded roadbeds within the Sugarloaf Ridge State Park. During these efforts, culverts were increased in size and properly placed to avoid off-road impacts and accelerated sedimentation. The roadbeds were also outsloped to prevent water from being carried down the roadbeds, which also causes hydrologic modifications. Several additional miles of degraded road have been identified for future repair work (Circuit Rider Productions 1999; Pacific Watershed Associates 1998).

Chapter 2, pg. 2-28 (8.10 – Citation)

Table 2-1
Sonoma Creek Stream Flow Data

	LOW	HIGH
Total annual discharge	1,000 af (1977)	114,000 af (1956)
Creek runoff in response to precipitation	15 inches (1977)	70 inches (1967)
Flood magnitude		8,800 cfs (December 1955)
Low flow	< 3 cfs (May – September)	

Sources: Sonoma Ecology Center and USGS

Note: Creek flows respond dramatically to precipitation. In general, more rain produces more runoff, but a higher percentage of precipitation becomes runoff in wet years than in dry years. In 1956, an estimated 58% (34 inches) of rainfall became runoff. In 1977, only 2% (0.3 inch) of rainfall became runoff. Thus, the amount of runoff in any given year is very sensitive to the amount of rainfall in that year. Stream flow is the water left over after precipitation has supplied the demands of evaporation from vegetation, soil, and water bodies. In a dry year, most and sometimes nearly all rainfall goes to meet evaporation and transpiration demands, and thus there would be very little stream flow. For example, in 1977, the driest year of the record, no flow was recorded at the gauge in most of June and all of July, August, and September (David Leland for the Sonoma Ecology Center, 2003).

af = acre-feet

cfs = cubic feet per second

Chapter 2, pg. 2-28 (8.11 – US Geological Society)

The U.S. Geological Survey (USGS) maintained a stream flow gauging station in Sonoma Creek from 1955 to 1981. It was located at the southeast corner of the Boyes Boulevard bridge from 1955 to 1967 and then relocated to the Agua Caliente Road bridge over Sonoma Creek until its discontinuation in 1981. USGS has since reinstalled the gage on Sonoma Creek, at the Agua Caliente Road crossing.

Chapter 2, pg. 2-31 (1.8 – Revisions to text describing vegetation types)

All of these vegetation types are considered to represent important resource values. The mixed evergreen forest and oak woodland types are the most common vegetation types in the General Plan study area. The riparian woodland, mesic herbaceous, chaparral, and other types are important for habitat diversity. They do not cover as much area as the mixed evergreen forest and oak woodland types, but provide habitat for many of the park's species that would not otherwise occur in the park. In addition, areas within the riparian woodland and the mesic herbaceous vegetation could be considered jurisdictional wetlands and therefore fall under the jurisdiction of regulatory agencies.

The vegetation designations follow as closely as possible to the naming system developed in Sawyer and Keeler-Wolf (1995). In some cases, the vegetation types were grouped because they cannot be readily distinguished and mapped in the field. Mesic herbaceous and mixed chaparral are examples of aggregating vegetation types.

- Non-native grassland – Non-native annual grasses and forbs from Europe dominate most of the grasslands in the General Plan study area. These grasslands occur in patches, and cover of these grassland approaches 100%. The dominant species include slender oats (*Avena barbata*), wild oats (*Avena fatua*), ripgut brome (*Bromus diandrus*), and soft chess (Bromus hordeaceus). Yellow-star thistle (*Centaurea solstitialis*) is often a dominant of the grassland. Common associates include air grass (Aira caryophyllea), little rattlesnake grass (*Briza minor*), Italian ryegrass (*Lolium multifiorum* and *L. perenne*), medusa head (*Taeniatherum caput-medusae*), sweet-pea (*Lathyrus cicera*), vetch (*Vicia villosa*), and various species of clover (*Trifolium spp.*). Narrow-anthered California brodiaea (*Brodiaea californica ssp. leptandra*) occurs in grasslands on Sugarloaf Ridge SP.

- Chamise chaparral – Chamise chaparral occurs primarily on south-facing slopes. Species diversity is relatively low, with chamise (*Adenostoma fasciculatum*) forming a closed shrub canopy. Occasional shrub associates include common manzanita (*Arctostaphylos manzanita ssp. manzanita*), toyon (*Heteromeles arbutifolia*), and scrub oak (*Quercus berberidifolia*). The sparse understory is made up primarily of nodding needlegrass (*Nassella cernua*). During the first few years after burns and other forms of disturbance, herbaceous species diversity increases. Post-fire associates include various species of herbs, including Apiastrum angustifolium and Emmenanthe penduliflora. Napa hog-fennel *(Lomatium repostum)*, an uncommon species which is on the California Native Plant Society watch list (List 4), occurs in this community in Sugarloaf Ridge SP and the region.

- Mixed chaparral – Mixed chaparral consists of different phases, including a Jepson musk-brush phase and a manzanita phase, both of which are included as mixed chaparral and scrub and chaparral on the vegetation map. Four special-status plant species are known to occur in this vegetation type on Sugarloaf Ridge SP: Sonoma ceanothus (*Ceanothus sonomensis*), Rincon Ridge ceanothus (*C. confusus*), Calistoga ceanothus (*C. divergens*), and narrow-anthered California brodiaea.

    - Jepson Musk-Brush Chaparral – A healthy population of Sonoma ceanothus (*Ceanothus sonomensis*) occurs along Goodspeed Trail, on the south-facing slope west of Bear Creek. This species is limited in distribution to the Hood Mountain Range in Sonoma and Napa Counties and is considered rare statewide by the California Native Plant Society (California Native Plant Society 2001).

- Coast Live Oak Woodland – Oak woodlands within the park are highly variable. Coast live oak (*Quercus agrifolia*) dominates a majority of the oak woodlands in the park. This woodland is often dominated by large coast live oak trees with a diameter at breast height (dbh) of more than 20 inches, interspersed with numerous multiple-stemmed coast live oak and California bay trees that range between 6 and 10 inches dbh. Occasional California buckeye (*Aesculus occidentalis*), valley oak (*Quercus lobata*), and Oregon oak (*Quercus garryana*) also occur in the coast live oak woodland. The understory is generally sparse, except in tree gaps where a variety of herbs grows, including a native sweet-pea (*Lathyrus vestitus*), deerbrush (*Lotus scoparius*), and woodland madia (*Madia gracilis*).

Shade-tolerant species in this community include woodland sanicle (*Sanicula crassicaulis*), toyon (*Heteromeles arbutifolia*), woodland rose, snowberry (*Symphoriocarpos sp.*), and poison oak. Saplings of Douglas-fir (*Pseudotsuga menziesii*) also occur in this type. A special-status plant species, Napa false indigo (*Amorpha californica var. napensis*) is known to occur in openings of woodlands in Sugarloaf Ridge SP.

Chapter 2, pp. 2-36-2-37 (8.9 – Sonoma County Water Agency fisheries monitoring)

The main watercourses that flow within the General Plan study area are Sonoma Creek, Santa Rosa Creek, and Calabazas Creek. These watercourses support relatively pristine stands of native vegetation and spawning habitat for steelhead (*Oncorhynchus mykiss*). Steelhead have been observed in Sonoma Creek within Sugarloaf Ridge State Park. Chinook salmon (*Oncorhynchus tshawytscha*) occur in Sonoma Creek in Adobe Canyon about one-half mile below the boundary of the park. Adult salmon have been observed in this area for two years, and juveniles were observed last year. The Sonoma County Water Agency has been conducting fisheries enhancement projects in the upper Santa Rosa Creek Watershed (see previous discussion regarding surface water)

For spawning, steelhead and chinook salmon require relatively cold water and gravels that are located in riffles. These areas provide the oxygen concentration necessary for successful development of the eggs. The spawning areas are especially susceptible to the deposition of sediment. Sediment prevents oxygen from reaching the eggs and can destroy a spawning area. Erosion is occurring along a portion of the headwaters of Sonoma Creek and may affect spawning habitat. Also, maintenance of summer stream flows is especially important in maintaining summer rearing habitat for salmonid species. The Sonoma Ecology Center is currently preparing a water quality control plan for the Sonoma Creek Watershed.

Chapter 2, pg. 2-42 (Response 1.9 – Potential for occurrence on special status plant list)

Table 2-2 will be amended as follows:

Table 2-2
Special-Status Species in the Sugarloaf Ridge State Park General Plan Study Area

SPECIES	HABITAT	POTENTIAL FOR OCCURRENCE	CNPS	DFG	USFWS
PLANTS					
Marin Checkerbloom *Sicalcea hickmanii* ssp. *viridis*	Serpentine chaparral	Habitat present, occurrence possible, although not observed	1B	--	--

Chapter 2, pg. 2-73 (11.7 – Access Roadways – Nunns Canyon Road)

Direct access to the Nunns Canyon Management Zone is provided by Nunns Canyon Road. Nunns Canyon Road is a one-lane, poorly paved roadway extending east from State Route 12. It is stop-sign-controlled on its approach to State Route 12, and a left-turn lane has been provided on the southbound State Route 12 intersection approach. This portion of Nunns Canyon Road is the sole feeder and access to Nelligan Road, also a one-way road of varying width. Nelligan Road traverses approximately 2.5 miles up to the top of the Mayacamas

Ridge. Land use is primarily agriculturally influenced, with traffic patterns varying depending on the rhythm of the seasons. Nunns Canyon is the sole access for emergency services required on Nelligan Road.

Chapter 3, pp. 3-5 and 3-6 (1.17 – Formatting)

NR-1: Utilize existing GIS system for Sugarloaf Ridge State Park to continue evaluation of relationships between different natural resource systems, to track resource management activities, and to evaluate progress towards individual resource goals.

NR-2: Maintain a cumulative list and GIS database of plant and wildlife species in the park. Update the natural resources inventory summarized in Chapter 2, Existing Conditions, and associated GIS database with plant and wildlife species observed during surveys conducted for individual improvement projects or other observations by park personnel or other qualified observers over time. To the extent feasible, conduct additional surveys to identify the biological resources in areas of the park that have not yet been surveyed, including areas acquired since the last inventory. (General plan implementation, however, is not dependent on completion of these studies.) This list should be kept on file, and used for future biological studies, proposed project impact analysis, and as a baseline for educational purposes.

Chapter 3, pp. 3-6–8

8.2 – Regulatory Framework

8.3 – Current areas of concern for water quality

8.4 – Water Quantity

8.9 – Sonoma County Water Agency fisheries monitoring

8.14–23 – Environmental quality indicators for water quality,

Hydrology/***Water Quality***

Hydrology/Water Quality

Sugarloaf Ridge State Park contains the headwaters of Santa Rosa Creek and Sonoma Creek, including its tributaries of Bear Creek to the north and Calabazas Creek to the south. The ridges within the park form the dividing line between the two watersheds. These watercourses provide important aquatic habitat; support sensitive wetland and riparian vegetation along the stream banks; and provide water for a range of wildlife within the park and region. Stream flow in all creeks flowing out of Sugarloaf Ridge State Park support steelhead and Chinook salmon spawning and summer rearing habitats.

In 1996, the Bay Area Water Quality Control Board, under the guidelines of the federal Clean

Water Act, Section 303(d), listed the Sonoma Creek watershed as 'Impaired.' This listing places more stringent standards on monitoring, quality, and quantity of water related to beneficial uses, including fisheries, to which the Department must adhere.[4] Water quality and spawning habitat for steelhead and Chinook salmon could be affected by visitor disturbance of streambeds and increased sedimentation and pollutant loads from construction of new facilities and impervious surfaces. Potential changes in the groundwater table from increases in water use could also affect stream flow. However, conscientious management and proposed methods to reduce erosion ensure adequate stream flow for salmonid spawning and protect water quality of the creeks that flow through the park.

The primary responsibility for protection of water quality in California lies with the State Water Resources Control Board and nine regional water quality control boards (RWQCBs). In the Sugarloaf Ridge State Park area, the San Francisco Bay Area RWQCB oversees the Sonoma Creek watershed and the North Coast RWQCB oversees the Santa Rosa Creek watershed. RWQCBs are responsible for adopting and implementing the water quality control plan that sets forth the water quality standards and control measures for surface water and groundwater within their respective jurisdictions.

Goal

- Protect and restore the water quality in the Sonoma, Santa Rosa, Bear, and Calabazas Creek watersheds, and to the extent feasible, provide for adequate stream flow is available to continue to support steelhead and Chinook salmon spawning and rearing habitats.

Guidelines

WQ-1: As time and funding allow, identify existing sources of pollution/sedimentation in the park's creeks and take appropriate, source–specific abatement actions. Monitor and evaluate the effectiveness of the actions and make any necessary changes based on the evaluation. The Sonoma County Water Agency (Fisheries Division) measurements of water and fish levels could provide baseline data for this monitoring effort in the Santa Rosa Creek watershed.

WQ-2: Avoid or minimize to the extent practicable deposition and discharge of sediment, debris, waste, and other pollutants into surface runoff, drainage systems, surface water bodies, and groundwater.

WQ-3: To minimize potential degradation of water quality, efforts should be made to discourage park visitors from entering creeks and associated sensitive habitat areas, including wetlands, riparian areas, and streambeds. Possible options include:

- Providing a few, well-marked visitor access points to the creeks

[4] The Sonoma Ecology Center is currently preparing a water quality control plan for the Sonoma Creek watershed. Discussion with Caitlin Cornwall, February 16, 2004

- In intensive visitor use areas, constructing split-rail fences or using other methods to limit access and protect riparian habitat. Include interpretive signs about the importance of riparian habitat (See Interpretive section)
- Establishing guidelines for siting future campsites and facilities away from the creeks and their tributaries
- Minimizing trails crossing through creeks and streams; where practicable; building bridges over the stream crossings; where crossing is not needed, developing pedestrian-only spur trails with access to the creek

WQ-4: During the planning and design of area-specific projects, where feasible incorporate a minimum setback of 50 to 100 feet from the bankfull width of the stream or creek channel to minimize the deposition and discharge of sediment and other pollutants into streams and creeks. When the setback is less than 100 feet, incorporate stormwater management measures such as planting native vegetation to slow runoff entering the stream.

WQ-5: During the planning and design of area-specific projects, minimize native vegetation removal in riparian areas to safeguard the beneficial uses of the stream. Where vegetation must be removed, projects should incorporate appropriate mitigation, such as the replanting and vegetation enhancement elsewhere.

WQ-6: Evaluate new area-specific projects during the planning and design process to ensure they do not increase water flows (from bankfull to full flood stages) in the creeks that would result in downstream flooding or cause localized bank erosion.

WQ-7: Use water efficiently and reduce water demand by:

- Requiring water conserving design and equipment in new construction
- Encouraging water conserving landscaping and other conservation measures
- Encouraging retrofitting with water conserving devices
- Designing wastewater systems that require minimal inflow and infiltration to the extent economically feasible
- Limiting impervious surfaces to minimize runoff; consider the use of permeable materials during the design of new or expanded roadways and parking lots

WQ-8: Design, construct and maintain new and existing buildings, roads, bridges, and drainage and other facilities using best management practices for erosion control and surface runoff to avoid or minimize sediment and other pollutants in storm water flows to the maximum extent practicable. Develop appropriate project-level CEQA documentation and NPDES permits, providing the environmental evaluation and mitigation measures necessary to avoid, reduce, or minimize potentially significant impacts to water quality. Principal control measures will include, but are not limited to, the following:

- As time and funding allow, identify existing areas of concern with respect to water quality and develop plans to remediate as appropriate to fulfill the intent of guidelines WQ-1 and WQ-2
- Remedial erosion and drainage control both during and after construction
- Installation and maintenance of erosion and surface runoff control measures
- Evaluate proposed alterations to existing drainage patterns so as not to result in increased erosion and sedimentation or increased flood flows
- Controls on non-point source discharges from new facilities (i.e. impervious surface coverage)
- Adherence to water quality protection standards and control measures available in the RWQCB's water quality control plan for the region
- Factoring the needs of sensitive aquatic species into the timing and implementation of any work that results in streambed alteration or riparian disturbance to avoid adverse impacts to these species
- When feasible, avoiding construction in the rainy season

WQ-9: With development of horse-related facilities, implement measures to reduce transport of pollutants from animal waste to the creeks. These measures[1] may include, but will not be limited to, the following:

- Adhere to Guideline WQ-4 when siting new facilities;
- Clean up manure on a regular basis, especially during wet weather;
- After clean up, during the arid summer, water areas where horses frequently deposit manure. Watering maintains the moist environment bacteria need to decompose residual waste;
- Store horse waste in an impervious surface and under cover;
- Separate barnyards, corrals, and manure storage areas from streams with buffer strips of vegetation to filter sediments and absorb nutrients in runoff; and
- Use grassed ditches, berms, or subsurface drains to divert "clean" runoff around barns, manure storage areas, and corrals.

WQ-10: Replace septic systems, as necessary with the best available technology.

WQ-11: Consider development of a wastewater treatment system if widespread septic system problems occur that are a health concern and cannot be addressed by on-site maintenance and management programs.

Ranger observations of restrooms and septic leach fields, and water quality tests could

[1] Council of Bay Area Resource Conservation Districts (no date). *Horse Owners Guide to Water Quality Protection.*

provide initial indications of septic problems. Further studies would follow to determine the nature and severity of the problem. See Response to Comment 8.3.

WQ-12: To the extent feasible, restore degraded riparian and aquatic habitat that will not recover in a reasonable time if left untreated.

WQ-13: Develop an interpretation program aimed at educating the public on ways to improve and maintain water quality and riparian and wetland ecosystems.

WQ-14: Control turkeys, feral pigs and other exotic animal populations to improve water quality in areas degraded by animal wallowing.

WQ-15: Stream flow in all creeks flowing out of Sugarloaf Ridge State Park should not be reduced below the amount needd to support salmonid spawning and summer rearing habitats. For all projects proposing to use water originating within the watersheds of Sugarloaf Ridge State Park, provide an assessment of increased water use and potential effects of changes in stream flow on aquatic habitat, especially for salmonids.

Chapter 3, pg. 3-9 (1.19 – Special Status and Native Plant Goals and Guidelines)

BIO-3: As part of the planning and design process for area-specific projects, and prior to commencement of final siting for new facilities or enhancements, the Department will develop the appropriate project-level CEQA documentation and environmental evaluation and mitigation measures necessary to avoid, reduce, or minimize potentially significant impacts to special-status plant species. These measures may include:

- A qualified botanist using appropriate protocols will identify any suitable habitat for special-status plant species that potentially could occur in the affected area, and will conduct appropriately timed surveys if such species may be disturbed by the proposed project. Data from Chapter 2, Existing Conditions, the appropriate resource agencies, and CNPS will be consulted to identify species of concern.

Chapter 3, pp. 3-19–3-20

8.3 – Current areas of concern for water quality

7.5 – Recommendation to monitor traffic on Adobe Canyon Road

9.1 – Adobe Canyon Road Parking

CIRC-2: Improve and maintain primary visitor access roads to avoid or minimize adverse effects on the environment and to safely accommodate expected visitor use. Pay special attention to use by vehicles pulling horse trailers.

- Identify areas for potential improvements along existing roads for erosion control, stabilization, and reduction of sediment-causing conditions.

- Identify areas for stabilization, widening (particularly through curves) and construction of turnouts along Los Alamos Road and Nunns Canyon Road1. Work with the Sonoma County Public Works Department for the maintenance and repair of Adobe Canyon Road, Los Alamos Road, and Nunns Canyon Road.
- Consider providing and maintaining signs along all roads providing access to park equestrian staging areas alerting drivers in advance share the road with bicyclists and to provide information on roadway conditions such as steep grades, sharp curves, absence of pullouts or frequency of pullouts, and any other condition that might influence a driver's decision to use the roadway.
- Consider traffic-calming and speed reduction measures for park access roads, including those that pass through residential neighborhoods.

CIRC-3: Encourage Sonoma County Public Works Department to widen Adobe Canyon Road near the intersection with State Route 12, stripe to improve and clearly separate the two westbound approach lanes to State Route 12, and signalize the State Route 12 / Adobe Canyon Road intersection when warranted. As part of the planning and design process for area-specific projects, the Department will review areas of potential impacts in accordance with CEQA prior to site-specific development. During the project-level environmental review, the Department should assess the potential increase in trips generated by the project and propose appropriate mitigation measures at that time. The Department does not have funding to annually monitor traffic to and from the park.

Chapter 3, pg. 3-24 (2.1 – Protecting the property rights of adjacent land owners)

TRAIL-6: To the extent feasible and where appropriate, install trail signs with levels of difficulty (per Departmental standards). For trail projects near adjacent properties install signs at appropriate intervals that clarify park boundaries.

Chapter 3, pg. 3-26 (2.1 – Protecting the property rights of adjacent land owners)

INTERP-3: Primary Theme #3: Protecting park resources requires help on several levels.

A. Enlightened visitor use—explain the need to reduce impact. Describe effect of personal choices on the natural and cultural landscape. At a finer scale, visitors' behavior can have significant impacts on the park; interpretive materials will encourage visitors to tread lightly or "leave no trace" as they explore this wildland, and to take that same ethic home with them to their urban and suburban environments. Visitors will be reminded to avoid trespassing and to respect private lands.

Chapter 3, pg. 3-30 (8.4 – Water Quantity)

PROJ-4: As part of the planning and design process for area-specific projects, conduct an analysis of potable water availability and wastewater capacity, as appropriate, when determining where and how utilities (e.g., sewer; water; drainage) will be provided. For all projects proposing to use water originating within the watersheds of Sugarloaf Ridge State Park,

provide an assessment of increased water use and protocol for evaluating, monitoring, and adjusting potential effects of changes in stream flow on aquatic habitat, especially for salmonids.

Chapter 3, pg. 3-43 (8.20 – WQ-9)

ADOBE-22: Implement measures to reduce transport of animal waste pollutants from the horse barn and equestrian corrals to Sonoma Creek (see WQ-9).

Chapter 3 pg. 3-46 (2.5 – Proposed development at the Los Alamos trailhead).

SRCW-2: Work with SCRP to develop additional visitor use and operational facilities at the Los Alamos Road parking and trailhead area at the north end of Hood Mountain Regional Park. Facilities could include a ranger office, employee residence, interpretive sites, an interpretive center, potable water and restrooms

Chapter 3, pg 3-48 (3.4 – Prevention of trespassing on private property).

NC -5: Prior to opening park visitor access from Nunns Canyon Road, develop management strategies to allow safe use of the road by park visitors and residential property owners which could include but not be limited to the following;

- Allow residential property owners to maintain vehicular access to their properties from Nunns Canyon Road. Consider options such as coded access for residents, their guests and suppliers.
- Discourage visitor trespassing on private property adjacent to the park by posting the park boundary, controlling vehicular access to areas east of the quarry area, ranger surveillance, or other methods to control access to private property.
- Restrict park visitor vehicular access beyond the quarry.

Chapter 3, pg. 3-49 (11.8 – Public Safety)

NC-7: Work with CDF and other jurisdictions to establish a secondary emergency access route for park visitors and residences in case upper Nunns Canyon Road is blocked during an emergency.

Chapter 3, pg. 3-53. Table 3-1 (8-24 – Environmental quality indicators for water quality)

Table 3-1 is revised as follows:

Table 3-1
Carrying Capacity

GOAL	DESIRED OUTCOME / STANDARD	ENVIRONMENTAL QUALITY INDICATORS[a]	POTENTIAL MONITORING ACTIVITIES
WQ: Protect and restore the water quality in the Sonoma, Santa Rosa, Bear, and Calabazas Creek watersheds	Water quality in the park's creeks exceeding established standards and forming the baseline for all water quality evaluations downstream	• Adequate stream flow is available to continue to support spawning habitat for steelhead and Chinook salmon. • Bank erosion where roads and trails are known to have caused sedimentation is minimized • Discharge of sediment from road and trail management activities is minimized. • Grassy swales and other erosion and water quality control measures after storm events properly function • Septic or other wastewater treatment systems properly function • Regularly monitor turbidity in water courses to evaluate changes in environmental conditions.	• Measure water well production rates and evaluate ground water levels with stream flows. • Staff observations during day-to-day operations • Periodic steelhead surveys • Periodic testing of water quality with the Sonoma Ecology Center or other organizations • Evaluation of park access roads for erosion and sediment control • Regularly monitor water turbidity.

Chapter 4, pg. 4-9 (8.13 – Well Characteristics)

Water Supply/Groundwater

The Preliminary General Plan recommends the construction of a new restroom facility with showers in the family campground in the Adobe Canyon Management Zone. The park's existing potable water is supplied by groundwater. The availability of groundwater to supply the restroom's additional water demand is known to be approximately 30,000 gallons per day. The Preliminary General Plan is a program-level document outlining future development on a parkwide scale; therefore, the level of detail necessary for project-level impact analysis is not possible. Feasibility studies, including water supply availability would assess potential effects of increased water use to evaluate potential effects to stream flow to minimize impacts aquatic habitat, especially salmonids. These studies would be conducted in conjunction with detailed project design and construction (Guideline PROJ-4). Additional environmental review would occur at a project level, and appropriate mitigation measures to avoid or minimize impacts to the groundwater source or changes in stream flow would be developed at that time.

Chapter 4, page 4-48 (5.2 – Proposed actions and daily visitor capacity comparison table)

Table 4.7, as follows, will be inserted with the following introduction:

The following is a comparison of the alternatives presented. These were discussed in the second public meeting held on May 22, 2003.

Table 4-7 Alternatives Comparison Table

FACILITIES	EXISTING CONDITION	ALTERNATIVES		
		A	B	C
Max Visitors at One Time (Preliminary Estimate)[b]	900	1,000	1,300	1,700
Max Visitors Per Day (Preliminary Estimate)[b]	1,700	1,800	2,400	3,000
Trail Connections				
McCormick–Red Barn trail connection	No	Yes	Yes	Yes
Hood Mtn.–McCormick trail connection	No	Yes	Yes	Yes
Beltane–Upper Adobe Canyon trail connection	No	Yes	Yes	Yes
Bear Creek trail connection	No	No	Yes	Yes
Facilities in Upper Adobe Canyon				
Camping Facilities				
Family Campsites (8 people per site)	49	44	58	70
Move Large Group Campsite (50 people)	No	Yes	Yes	Yes
Add Reservable Corrals for Equestrian Camping	No	No	No	Yes
Limited Access Small Group Campsites (15 people per site)	0	0	1	4
Primitive Campsites (8 people per site)	0	0	0	8
Expand Observatory (classrooms & restroom)	No	No	Yes	Yes
Horse Barn				
Horse Concession	Yes	Yes	Yes	Yes
Maintenance Storage	Yes	No	No	No
Interpretive Center	No	No	Yes	Yes
Picnic Area	No	No	Yes	Yes
Visitor Center (no changes)	Yes	Yes	Yes	Yes
New restroom facility with showers	No	Yes	Yes	Yes
Picnic areas	5	5	8	8
Consolidate maintenance shop and equipment storage into new facility	No	Yes	Yes	Yes
Parking [c, d] total: (new):	241	253 (12)	356 (103)	418 (62)
Max Visitors at One Time (Preliminary Estimate)[b]	900	1,000	1,300	1,700
Max Visitors Per Day (Preliminary Estimate)[b]	1,700	1,800	2,400	3,000
Facilities in Broader Areas of the Park				
McCormick				
Los Alamos Road trailhead & parking (by County)	30	30	30	30
Construct new bridge(s) over Santa Rosa Creek for access to Hood Mtn and McCormick	No	Yes	Yes	Yes

Table 4-7 Alternatives Comparison Table (cont.)

FACILITIES	EXISTING CONDITION	ALTERNATIVES		
		A	B	C
Additional visitor use and operational facilities (Ranger station and/ or interpretive center)	No	No	No	Yes
Primitive campsites (8 people per site)	0	0	2	4
Beltane				
Quarry area restoration and trailhead	No	Yes	Yes	Yes
Parking [c]	0	20	30	40
Interpretive displays	No	No	No	Yes
Picnic areas	No	No	Yes	Yes
Primitive campsites (8 people per site)	0	0	2	4
Red Barn				
Primitive Campsites (8 people per site)	0	0	2	4
Harr Ranch				
Picnic area	No	No	Yes	Yes
Interpretive displays	No	No	No	Yes
Limited access small group campsite (15 people per site)	0	0	0	1
Special event facility (25 people max)	No	No	No	Yes
Restroom facilities	No	No	No	Yes
Hood Mountain Regional Park (by County) [e]				
Pythian Road trailhead & parking	No	Separate County Action		
Primitive campsites (Azalea Camp)	No	Separate County Action		

[b] *Visitor estimates are based on parking availability and observed turn-over rates.*

[c] *Parking space numbers are estimates. Parking will be sized to meet growing demand over time.*

[d] *Parking in Upper Adobe Canyon includes expansion of the day use lot, visitor center lot, horse barn lot, and parking for additional small group and family campsites.*

[e] *State Parks supports the County's development of the Azalea Campground and Pythian Road trailhead and parking for Hood Mountain Regional Park.*

Page 4-39 (4.4 – Cumulative Projects)

Table 4-6 has been revised as follows:

Table 4-6 Cumulative Projects

PROJECT	DESCRIPTION/NOTES
2005	
Sonoma Country Inn	50-room inn, spa, winery and residential complex.
Stone Gate Subdivision	8 single family residential units
Ledson Winery and Event Center	Existing facility, no new vehicle trips
Community School	Replacement of existing school – no new trips
Hood Mountain Park Plan	No estimates of visitor use are available
Hood Mansion Restoration	No trips projected
Kenwood Wedding Center	Existing facility, no new trips
Darius Anderson Subdivision	3 single-family residential units
Deerfield Ranch Winery	New 45,000-case winery 20 special events per year
Mayo Winery	
Chauvet Hotel Site	6 Condominiums
Glen Ellen Inn	Expansion - 4 new rooms
Gaige House Inn	Expansion from 15 to 23 units (8 new rooms)
Juvenile Justice Center	Facility expansion
Valley of the Moon Children's Home	
Orchards at Oakmont Subdivision	new senior subdivision - 165 senior units
Annadel Vineyards	New winery - 50,000 cases
Mobius Painter Winery	New winery - 150,000 cases Tours, tasting, sales 10 a.m. to 4 p.m. weekdays
Landmark Winery	Winery expansion - expand to 35,000 cases per year
Blackstone Winery (formerly known as McRhostie and St. Francis Winery)	Winery expansion and events application - expand from 14,000 cases to 125,000 cases per year plus special events
St. Francis Winery and Vineyards	Events application only
Chateau St. Jean Winery Expansion	Winery expansion and events application - expand from 250,000 cases to 750,000 cases per year plus special events
Korbel (Kenwood Winery)	Expand from 125,000 cases to 500,000 cases per year
Kenwood Inn Expansion	24 new units
Graywood Ranch Subdivision	3 single-family residential units
2012	
Wolf House Hotel	
Las Ventanas Sonoma	98-room resort, spa, 180-seat restaurant

Appendix C (1.10 – Appendix C revisions)

Appendix C has been revised to include the correct spellings of plant names. The revised list (which will replace the list in Appendix C of the Draft EIR) is provided in Appendix A

Appendix D, pp. D-5 and D-7 (4.3 – Maximum Daily Traffic Generation)

Note: although the Sugarloaf Ridge DEIR text stated that the Sunday ambient peak hour occurred between 4:30–5:30, this is incorrect, and has been corrected in the EIR text. The correct Sunday afternoon peak hour was found to occur between 3:30–4:30 p.m.

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Appendix A: Plant List for Sugarloaf Ridge State Park General Plan Study Area

Plant List for Sugarloaf Ridge State Park General Plan Study Area

SCIENTIFIC NAME	COMMON NAME
Acer macrophyllum	Big-leaf maple
Achillea millefolium	Yarrow
Achyrachaena mollis	Blow-wives
Adenocaulon bicolor	Trail plant, Indian guide, Silver arrow
Adenostoma fasciculatum	Chamise
Adiantum aleuticum	Five-finger fern
Adiantum jordanii	California maiden-hair Fern
Aegilops triuncialis	Barbed goatgrass
Aesculus californica	California buckeye
Agoseris apargioides	Agoseris
Agoseris grandiflora	Large-flowered Agoseris
Agoseris heterophylla	Annual Agoseris
Agoseris retrorsa	Spear-leaved Agoseris
Agrostis capillaris	Colonial bent grass
Agrostis exarata	Western bent grass
Agrostis oregonensis	Bent grass
Agrostis pallens	Bent grass
Agrostis pallens	Bent grass
Agrostis sp.	Bent grass
Aira caryophyllea	Silver European hair grass
Allium amplectens	Narrow-leaved onion
Allium falcifolium	Scythe-leaved onion
Allophyllum divaricatum	Allophyllum
Alnus rhombifolia	White alder
Alnus rubra	Red alder
Amelanchier alnifolia	Service berry
Amelanchier utahensis	Utah service berry
Amorpha califomica var. napensis	False Indigo
Amsinckia menziesii var. intermedia	Fiddleneck
Anagallis arvensis	Scarlet pimpernel
Anaphalis margaritacea	Pearly everlasting
Angelica tomentosa	Angelica
Anthemis cotula	Mayweed
Anthriscus caucalis	Bur chervil
Antirrhinum virga	Tall snapdragon
Aphanes occidentalis	Western lady's mantle
Apiastrum angustifolium	Wild celery
Aquilegia eximia	Columbine
Aquilegia formosa	Columbine
Arabis breweri	Brewer's rock cress

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Arabis glabra var. glabra	Tower mustard
Aralia californica	Elk Clover
Arbutus menziesii	Pacific madrone
Arctostaphylos canescens	Hoary manzanita
Arctostaphylos glandulosa ssp. glandulosa	Eastwood manzanita
Arctostaphylos manzanita	Common manzanita
Arctostaphylos stanfordiana ssp. stanfordiana	Stanford Manzanita
Arctostaphylos tomentosa ssp. crustacea	Brittle-leaf manzanita
Arctostaphylos viscida	White-leaved manzanita
Aristolochia californica	California pipevine
Arnica discoidea	Rayless Arnica
Artemisia douglasiana	Mugwort
Asclepias cordifolia	Purple Milkweed
Aspidotis densa	Indian's dream
Aster radulinus	Rough-leaved aster
Astragalus gambelianus	Dwarf locoweed
Athysanus pusillus	Dwarf Aathysanus
Avena barbata	Slender wild oat
Avena fatua	Wild oat
Avena sativa	Cultivated oat
Baccharis pilularis	Coyote brush
Barbarea orthoceras	Winter cress
Barbarea vulgaris	Common winter cress
Boykinia occidentalis	Boykinia
Brachypodium distachyon	Brachypodium
Brassica nigra	Black mustard
Brassica rapa	Field mustard
Briza maxima	Large quzking grass
Briza minor	Small quaking grass
Brodiaea elegans ssp. elegans	Harvest brodiaea
Bromus carinatus var. carinatus	California brome
Bromus diandrus	Ripgut grass
Bromus hordeaceus	Soft chess
Bromus laevipes	Woodland brome grass
Bromus madritensis ssp. rubens	Foxtail chess
Calamagrostis ophitidis	Serpentine reed grass
Calandrinia ciliata	Red maids
Calochortus amabilis	Diogenes' lantern, Golden fairy lantern
Calochortus luteus	Yellow mariposa lily
Calochortus tolmiei	Pussy ears

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Calycadenia truncata	Rosin weed
Calycanthus occidentalis	Spicebush
Calyptridium quadripetalum	Four-petaled pussypaws
Calystegia collina	Morning-glory
Calystegia malacophylla	Sierra morning-glory
Calystegia occidentalis ssp. occidentalis	Morning-glory
Calystegia purpurata	Morning-glory
Calystegia purpurata ssp. purpurata	Morning-glory
Capsella bursa-pastoris	Shepherd's purse
Cardamine californica	Milk maids
Cardamine californica	Milk maids, toothwort
Cardamine oligosperma	Bitter-cress
Carduus pycnocephalus	Italian thistle
Carex amplifolia	Ample-leaved sedge
Carex brevicaulis	Short-stemmed sedge
Carex buxbaumii	Buxbaum's sedge
Carex densa	Dense sedge
Carex globosa	Round-fruited sedge
Carex nudata	Torrent sedge
Carex ovalis	Sedge
Carex subfusca	Rusty sedge
Carex tumulicola	Foothill sedge
Carthamus sp.	Distaff thistle
Castilleja attenuata	Valley tassels
Castilleja densiflora	Owls clover
Castilleja foliolosa	Woody Indian paintbrush
Castilleja rubicundula ssp. lithospermoides	Cream sacs
Ceanothus confusus	Rincon Ridge Ceanothus
Ceanothus cuneatus	Buck brush
Ceanothus divergens	Calistoga Ceanothus
Ceanothus foliosus var. foliosus	Wavyleaf Ceanothus
Ceanothus jepsonii var. jepsonii	Musk brush
Ceanothus oliganthus var. sorediatus	Jim brush
Ceanothus parryi	Parry's Ceanothus, lady-bush
Ceanothus sonomensis	Sonoma Ceanothus
Centaurea diffusa	Diffuse knapweed
Centaurea melitensis	Tocalote, Napa thistle
Centaurea solstitialis	Yellow star-thistle
Centaurium davyi	Davy's centaury
Centaurium trichanthum	Alkali centaury

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Cerastium glomeratum	Mouse-ear chickweed
Cercocarpus betuloides	Mountain-mahogany
Chamomilla suaveolens	Pineapple weed
Cheilanthes intertexta	Coastal lip-fern
Chlorogalum pomeridianum	Soap plant, Amole
Chorizanthe membranacea	Pink spineflower
Cichorium intybus	Chicory
Cirsium occidentale var. venustum	Venus thistle
Cirsium remotifolium	Remote-leaved thistle
Cirsium vulgare	Bull Thistle
Clarkia amoena	Farewell-to-spring
Clarkia concinna	Red ribbons
Clarkia gracilis	Clarkia
Clarkia purpurea	Purple Clarkia
Clarkia purpurea ssp. quadrivulnera	Four-spot
Clarkia purpurea ssp. viminea	Clarkia
Clarkia unguiculata	Clarkia
Claytonia exigua ssp. exigua	Claytonia
Claytonia gypsophiloides	Claytonia
Claytonia parviflora	Claytonia
Claytonia parviflora ssp. parviflora	Claytonia
Claytonia perfoliata	Miner's lettuce
Clematis lasiantha	Pipestems
Collinsia heterophylla	Chinese houses
Collinsia sparsiflora var. arvensis	Few-flowered blue-eyed Mary
Collinsia sparsiflora var. collina	Few-flowered blue-eyed Mary
Conium maculatum	Poison hemlock
Convolvulus arvensis	Bindweed
Conyza canadensis	Horseweed
Corallorhiza striata	Striped coralroot
Cordylanthus sp.	Bird's-beak
Corylus cornuta v. califomica	Hazelnut
Crassula connata	Sand pigmyweed
Cryptantha flaccida	Flaccid Cryptantha
Cupressus sargentii	Sargent cypress
Cuscuta californica var. californica	Dodder
Cymopterus terebinthinus	Cymopterus
Cynodon dactylon	Bermuda grass
Cynoglossum grande	Hound's tongue
Cynosurus echinatus	Hedgehogdogtail grass

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Cyperus eragrostis	Nutsedge
Cystopteris fragilis	Fragile fern
Cytisus scoparius	Scotch broom
Dactylis glomerata	Orchard grass
Danthonia californica var. californica	California oatgrass
Datisca glomerata	Durango root
Daucus pusillus	Rattlesnake weed
Delphinium decorum	Coast larkspur
Delphinium hesperium	Western larkspur
Delphinium nudicaule	Red larkspur
Dendromecon rigida	Bush poppy
Dichelostemma capitatum ssp. capitatum	Blue dicks
Dichelostemma congestum	Ookow
Disporum hookeri	Hooker's fairy bells
Dodecatheon hendersonii	Sailor caps, Mosquito bills
Dryopteris arguta	Coastal wood fern
Dryopteris expansa	Wood fern
Dudleya cymosa	Live-forever
Eleocharis macrostachya	Pale spike-rush
Elymus elymoides ssp. californicus	Squirreltail
Elymus glaucus ssp. glaucus	Bluewildrye
Elymus multisetus	Big squirreltail
Elymus trachycaulus var. subsecundus	Slender wheatgrass
Emmenanthe penduliflora	Whispering bells
Epilobium brachycarpum	Willow herb
Epilobium canum	California fuchsia
Epilobium minutum	Minute willow herb
Equisetum arvense	Common horsetail
Equisetum hyemale ssp. affine	Common scouring rush
Equisetum laevigatum	Smooth scouring rush
Equisetum telmateia ssp. braunii	Giant horsetail
Eremocarpus setigerus	Dove weed, turkey mullein
Ericameria arborescens	Golden fleece
Erigeron biolettii	Streamside daisy
Erigeron foliosus	Leafy daisy
Erigeron inornatus	California rayless daisy
Erigeron philadelphicus	Philadelphia daisy
Erigonum luteolum var. luteolum	Wild buckwheat
Erigonum nudum var. nudum	Naked-stemmed Eriogonum
Erigonum vimineum	Wild buckwheat

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Eriodictyon californicum	Yerba Santa
Eriophyllum confertiflorum var. confertiflorum	Golden-yarrow
Eriophyllum lanatum var. achillaeoides	Wooly sunflower
Eriophyllum lanatum var. arachnoideum	Wooly sunflower
Erodium botrys	Long-beaked filaree, storksbill
Erodium brachycarpum	Filaree, storksbill
Erodium cicutarium	Red-stemmed filaree
Erodium moschatum	White-stemmed filaree, storksbill
Erodium obtisuplicatum	Filaree, storksbill
Erysimum capitatum	Western wallflower
Eschscholzia californica	California poppy
Eucalyptus globulus	Blue gum
Euphorbia peplus	Petty spurge
Festuca californica	California fescue
Festuca elmeri	Elmer's fescue
Festuca idahoensis	Idaho fescue, blue bunchgrass
Ficus carica	Fig
Filago californica	California filago
Filago gallica	Narrow-leaved Filago
Foeniculum vulgare	Sweet fennel
Fragaria vesca	Wood strawberry
Fraxinus latifolia	Oregon ash
Fritillaria affinis	Checker lily
Fritillaria recurva	Scarlet fritillary
Galium aparine	Goose grass, bedstraw, cleavers
Galium californicum	California bedstraw
Galium divaricatum	Lamarck's bedstraw
Galium murale	Tiny bedstraw
Galium parishii	Parish's bedstraw
Galium parisiense	Wall bedstraw
Galium porrigens var. tenue	Climbing bedstraw
Garrya congdonii	Silk tassel bush
Garrya elliptica	Coast silk tassel bush
Garrya fremontii	Fremont's silk tassel bush
Gastridium ventricosum	Nit grass
Gaultheria shallon	Salal
Genista monspessulana	French broom
Geranium carolinianum	Carolina Geranium
Geranium dissectum	Cut-leaved Geranium
Geranium molle	Dove's-foot Geranium

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Gilia capitata	Globe gilia
Gilia capitata ssp. capitata	Blue-field gilia
Gilia tricolor ssp. diffusa	Bird's eyes, Tricolor Gilia
Gilia tricolor ssp. tricolor	Bird's eyes, Tticolor Gilia
Gnaphalium californicum	Cudweed
Gnaphalium canescens	Cudweed
Gnaphalium purpureum	Purple cudweed
Guillenia lasiophylla	California mustard
Hedypnois cretica	Crete weed
Helenium puberulum	Sneezeweed
Helianthella californica	California Helianthella
Helianthemum scoparium	Peak rush-rose
Hemizonia congesta ssp. luzulifolia	Hayfield tarweed
Heracleum lanatum	Cow parsnip
Hesperevax sparsiflora	Hesperevax
Hesperolinon micranthum	Small-flowered dwarf flax
Hesperolinon spergulinum	Slender dwarf flax
Heterocodon rariflorum	Heterocodon
Heteromeles arbutifolia	Christmas berry, toyon
Heuchera micrantha	Alumroot
Hieracium albiflorum	White-flowered hawkweed
Hirschfeldia incana	Hoary mustard
Hoita macrostachya	Hoita
Holcus lanatus	Velvet grass
Holocarpha virgata	Graceful tarplant
Holodiscus discolor	Cream bush, oceanspray
Hordeum brachyantherum ssp. brachyantherum	Meadow barley
Hordeum jubatum	Foxtail barley
Hordeum marinum ssp. gussoneanum	Mediterranean barley
Hordeum murinum ssp. leporinum	Wild barley
Hordeum murinum ssp. murinum	Wild barley
Hypericum concinnum	Gold-wire
Hypericum perforatum	Klamathweed
Hypochaeris glabra	Smooth cat's ear
Hypochaeris radicata	Rough cat's ear
Iris fernaldii	Fernald's iris
Iris macrosiphon	Bowltube or slender-tubed iris
Iris purdyi	Purdy's iris
Isopyrum stipatatum	Siskiyou rue-anemone
Juglans californica var. californica	Southern California black walnut

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Juglans californica var. hindsii	Northern California black walnut
Juncus balticus	Baltic rush
Juncus bolanderi	Bolander's Rush
Juncus bufonius var. bufonius	Toad rush
Juncus effusus var. pacificus	Common rush
Juncus nevadensis	Sierra rush
Juncus occidentalis	Western rush
Juncus oxymeris	Pointed rush
Juncus patens	Common or spreading rush
Juncus xiphiodes	Iris-leaved rush
Keckiella corymbosa	Redwood Keckiella
Koeleria macrantha	Junegrass
Lactuca serriola	Prickly lettuce
Lamarckia aurea	Goldentop
Lamium purpureum	Red dead-nettlet
Lasthenia californica	Goldfields
Lathyrus aphaca	Yellow pea
Lathyrus brownii	Wild pea
Lathyrus cicera	Red peavine
Lathyrus hirsutus	Caley pea
Lathyrus sphaericus	Grass pea
Lathyrus vestitus var. ochropetalus	Pacific pea
Lemna minor	Lesser duckweed
Lemna minuta	Duckweed
Lepechinia calycina	Pitcher sage
Lepidium nitidum var. nitidum	Shining pepperweed
Lepidium strictum	Upright pepperweed
Lessingia ramulosa	Sonoma lessingia
Ligusticum apiifolium	Celery-leaved lovage
Lilium pardalinum	Leopard lily
Limnanthes douglasii	Common meadowfoam
Linanthus androsaceus	Common Linanthus, false baby stars
Linanthus bicolor	Bicolored Linanthus
Linanthus parviflorus	Linanthus
Lithocarpus densiflorus	Tanbark oak
Lithophragma affinie	Woodland star
Lithophragma campanulatum	Siskiyou Mountain woodland star
Lithophragma heterophyllum	Hillside woodland star
Lolium multiflorum	Italian ryegrass
Lolium perenne	Perennial ryegrass

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Lolium temulentum	Darnel ryegrass
Lomatium californicum	California Lomatium
Lomatium caruifolium	Alkali desert parsley
Lomatium dasycarpum ssp. dasycarpum	Woolly-fruited lomatium
Lomatium dasycarpum ssp. tomentosum	Lomatium
Lomatium repostum	Napa lomatium
Lomatium utriculatum	Common lomatium
Lonicera hispidula var. vacillans	Californica honeysuckle
Lonicera interrupta	Chaparral honeysuckle
Lotus humistratus	Bird's foot lotus, hill Lotusl
Lotus micranthus	Small flowered trefoil, hill Lotus
Lotus purshianus var. purshianus	Spanish clover
Lotus scoparius	Deerweed
Lotus wrangelianus	Calf lotus
Lunaria annua	Money plant, moonwort
Lupinus affinis	Fleshy lupine
Lupinus albifrons var. albifrons	Silver bush lupine
Lupinus bicolor	Dove lupine, miniature lupine
Lupinus formosus var. robustus	Summer lupine,
Lupinus latifolius var. latifolius	Broad-leaved lupine
Lupinus microcarpus	Chick lupine
Lupinus nanus	Sky lupine
Lupinus pachylobus	Big pod lupine
Lupinus stiversii	Harlequin lupine
Luzula comosa	Common or Pacific wood rush
Lythrum hyssopifolium	Hyssop loosestrife
Madia anomala	Plump-seeded madia, Tarweed
Madia elegans var. vernalis	Common madia
Madia exigua	Threadstem madia
Madia gracilis	Slender tarweed
Madia madioides	Woodland madia
Madia nutans	Volcanic tarweed
Malacothrix floccifera	Woolly desert dandelion
Marah fabaceus	Wild cucumber, Common manroot
Marrubium vulgare	Horehound
Medicago polymorpha	Bur-clover
Melica californica	California melic
Melica geyeri	Oniongrass, Melic
Melica subulata	Alaska onion-grass
Melica torreyana	Torrey's melic

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Melilotus indicus	Yellow sweet clover
Melissa officinalis	Lemon Balm
Mentha pulegium	Pennyroyal
Micropus californicus var. californicus	Slender cottonweed
Microseris douglasii	Silver puffs
Mimulus aurantiacus	Bush Monkeyflower
Mimulus cardinalis	Scarlet monkeyflower
Mimulus congdonii	Congdon's monkeyflower
Mimulus guttatus	Seep monkey flower
Mimulus kelloggii	Kellogg's monkeyflower
Mimulus moschatus	Musk monkeyflower
Minuartia douglasii	Douglas' sandwort
Monardella villosa	Coyote Mint
Monardella viridis	Coyote Mint
Montia fontana	Water-chickweed
Myosotis discolor	Forget-me-not
Nassella cernua	Nodding needlegrass
Nassella lepida	Foothill needlegrass
Nassella pulchra	Purple needlegrass
Navarretia leucocephala	White-flowered navarretia
Navarretia squarrosa	Skunk weed
Nemophila breviflora	Basin nemophila
Nemophila heterophylla	Small white Nemophila
Nemophila menziesii ssp. atomaria	Baby white eyes
Nemophila menziesii ssp. menziesii	Baby blue eyes
Nemophila pedunculata	Littlefoot nemophila
Oemleria cerasiformis	Oso Berry
Oenanthe sarmentosa	Pacific oenanthe
Olea europea	Olive
Orobanche bulbosa	Broom-rape
Orobanche fasciculata	Clustered broom-rape
Osmorhiza berteroi	Sweetcicely
Osmorhiza brachypoda	California sweetcicely
Parentucellia viscosa	Yellow parentucellia
Paspalum dilatatum	Dallis grass
Pedicularis densiflorus	Indian warrior
Pellaea andromedifolia	Coffee fern
Pellaea mucronata	Bird's-foot Fern
Penstemon heterophyllus	Bear-tongue, Penstemon
Penstemon heterophyllus var. heterophyllus	Foothill penstemon

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Pentagramma triangularis	Goldback Fern
Perideridia kelloggii	Kellogg's yampah
Petrorhagia dubia	Hairy pink
Petrorhagia nantueilii	Carnation
Phacelia californica	California phacelia
Phacelia distans	Wild heliotrope
Phacelia imbricata ssp. imbricata	Imbricate phacelia
Phacelia tanacetifolia	Lacy phacelia
Phalaris aquatica	Harding Grass
Phleum pratense	Timothy
Phlox gracilis	Slender phlox
Phoradendron densum	Dense mistletoe
Phoradendron villosum	Oak mistletoe
Physocarpus capitatus	Pacific ninebark
Pickeringia montana	Chaparral pea
Picris echioides	Bristly ox-tounge
Pinus attenuata	Knobcone pine
Pinus ponderosa	Ponderosa pine
Pinus radiata	Monterey pine
Pinus sabiniana	Gray pine
Piperia elegans	Elegant rein orchid
Piperia elongata	Piperia
Piperia transversa	Piperia
Piperia unalascensis	Slender-spire orchid
Piptatherum miliaceum	Smilo grass
Plagiobothrys collinus	Cooper's popcorn flower
Plagiobothrys nothofulvus	Popcorn flower
Plantago erecta	California plantain
Plantago lanceolata	English plantain
Plantago ovata	Desert indianwheat
Plantago patagonica	Woolly plantain
Platystemon californicus	Cream cups
Plectritis brachystemon	Longspur
Plectritis macrocera	White plectritis
Poa annua	Annual bluegrass
Poa bulbosa	Bulbous bluegrass
Poa nemoralis	Wood bluegrass
Poa secunda ssp. secunda	One-sided bluegrass
Poa trivialis	Trivial poa
Polycarpon tetraphyllum	Four-leaved allseed

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Polygala californica	Milkwort
Polygonum arenastrum	knotweed, Doorweed
Polygonum douglasii ssp. spergulariiforme	Knotweed
Polygonum hydropiper	Smartweed
Polypodium californicum	California polypody
Polypodium calirhiza	Nested polypody
Polypodium glycyrrhiza	Licorice fern
Polypogon interruptus	Ditch rabbitsfoot grass
Polypogon monspeliensis	Rabbitfoot grass
Polystichum dudleyi	Shield fern
Polystichum imbricans ssp. curtum	Narrowleaf swordleave
Polystichum munitum	Western sword fern
Potentilla glandulosa ssp. glandulosa	Sticky cinquefoil
Prunus avium	Sweet cherry
Prunus cerasifera	Cherry plum
Prunus domestica	European plum
Prunus emarginata	Bitter cherry
Prunus virginiana var. demissa	Western choke cherry
Pseudotsuga menziesii	Douglas Fir
Psilocarphus oregonus	Wooly-heads
Psoralea physodes	California tea
Pteridium aquilinum	Bracken fern
Pteridium aquilinum var. pubescens	Bracken fern
Pterostegia drymarioides	Pterostegia
Quercus agrifolia	Coast live oak
Quercus berberidifolia	Scrub oak
Quercus chrysolepis	Canyon oak
Quercus douglasii	Blue oak
Quercus durata	Leather oak
Quercus garryana	Oregon oak
Quercus kelloggii	California black oak
Quercus lobata	Valley oak
Quercus wislizenii	Interior live oak
Ranunculus californicus	California buttercup
Ranunculus lobbii	Lobb's buttercup
Ranunculus muricatus	Stickseed buttercup
Ranunculus orthorhynchus	Straightbeak buttercup
Raphanus sativus	Radish
Rhagadiolus stellatus	Endive daisy
Rhamnus californica	Coffeeberry

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Rhamnus crocea	Red berried buckthorn
Rhamnus ilicifolia	Holly-leaved coffeeberry
Rhododendron occidentale var. sonomense	Western Azalea
Rhus trilobata	Skunkbrush
Ribes californicum	Hillside gooseberry
Ribes inerme	White-stemmed gooseberry
Ribes menziesii	Canyon gooseberry
Ribes quercetorum	Oak gooseberry
Ribes roezlii var. cruentum	Sierra gooseberry
Ribes victoris	Victor's gooseberry
Rorippa nasturtium-aquaticum	Watercress
Rosa eglanteria	Sweet-brier
Rosa gymnocarpa	Wood Rose
Rosa spithamea var. sonomensis	Sonoma ground rose
Rubus discolor	Himalaya Blackberry
Rubus leucodermis	Blackcap Raspberry
Rubus parviflorus var. parviflorus	Thimbleberry
Rubus ursinus v. ursinus	California Blackberry
Rumex acetosella	Sheep sorrel
Rumex crispus	Curly dock
Rumex pulcher	Fiddle dock
Rumex salicifolius var. salcifolius	Willow dock
Rupertia physodes	Scurf-pea
Sagina sp.	Pearlwort
Salix laevigata	Red willow
Salix lasiolepis	Arroyo willow
Salix lucida ssp. lasianda	Yellow willow
Salvia columbariae	Chia
Salvia sonomensis	Sonoma sage
Sambucus mexicana	Blue elderberry
Sanicula bipinnatifida	Poison Sanicle, Purple sannicle
Sanicula crassicaulis	Yellow sanicle, Pacific sanicle
Sanicula laciniata	Coast sanicle
Satureja douglasii	Yerba Buena
Saxifraga californica	California saxifrage
Scandix pectin-veneris	Venus' Needle, Shepherd's needle
Scirpus microcarpus	Panicled bulrush
Scrophularia californica	Bee plant
Scutellaria californica	skullcap
Sedum spathulifolium	Pacific Stonecrop

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Selaginella bigelovii	Spike-moss
Selaginella wallacei	Little club moss
Senecio aronicoides	Butterweed
Senecio greenei	Green's packera
Senecio vulgaris	Common groundsel
Sequoia sempervirens	Redwood
Sidalcea diploscypha	Fringed checker bloom
Sidalcea malvaeflora	Checker bloom
Silene californica	California catchfly
Silene dichotoma	Dichotoma silene
Silene gallica	Common catchfly, Windmill pink
Silybum marianum	Milk thistle
Sisymbrium officinale	Hedge mustard
Sisyrinchium bellum	Western blue-eyed grass
Smilacena stellata var. sessilifolia	Slim solomon
Smilacina racemosa	False Solomon's seal
Solanum sp.	Nightshade
Solanum xanti	Chaparral nightshade
Soliva sessilis	Field burreed
Sonchus asper ssp. asper	Prickly sow-thistle
Sonchus oleraceus	Common sow thistle
Spergula arvensis ssp. arvensis	Stickwort, starwort
Spergularia rubra	Sand-spurrey
Stachys ajugoides ssp. ajugoides	Hedge-nettle
Stachys ajugoides var. rigida	Rigid hedge-nettle
Stachys albens	White hedge-nettle
Stellaria calycantha	Northern starwort
Stellaria media	Common chickweed
Stellaria nitens	Shining chickweed
Stellaria pallida	Chickweed
Stephanomeria virgata	Rod wirelettuce
Streptanthus barbiger	Bearded jewellflower
Streptanthus glandulosus ssp. glandulosus	Jewelflower
Stylocline amphiloba	Mt. Diablo cottonweed
Symphoricarpos albus v. laevigatus	Snowberry
Symphoricarpos mollis	Trailing snowberry, Creeping snowberry
Taeniatherum caput-medusae	Medusahead
Taraxacum californicum	Horned dandelion
Taraxacumn officinale	Dandelion
Thermopsis macrophylla	False lupine

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Thysanocarpus curvipes var. elegans	Fringe pod
Torilis arvensis	Hedge parsley
Torreya californica	California nutmeg
Toxicodendron diversilobum	Poison Oak
Tragopogon dubius	Goat's beard
Tragopogon porrifolius,	Oyster plant
Trichostemma laxum	Vinegar weed
Trientalis latifolia	Star flower
Trifolium albopurpureum var. albopurpureum	Common Indian clover
Trifolium albopurpureum var. dichotomum	Common Indian clover
Trifolium appendiculatum	Long-keeled clover
Trifolium barbigerum	Bearded clover
Trifolium bifidum var. decipiens	Notch-leaved clover
Trifolium campestre	Hop clover
Trifolium ciliolatum	Tree clover
Trifolium depauperatum var. amplectens	Balloon sack clover
Trifolium depauperatum var. depauperatum	Cowbag clover, Dwarf sack clover
Trifolium dichotomum	Branched Indian-clover
Trifolium dubium	Hop clover, Shamrock
Trifolium fragiferum	Strawberry clover
Trifolium fucatum	Bull clover
Trifolium hirtum	Rose clover
Trifolium microcephalum	Small headed clover
Trifolium microdon	Valparaiso clover, Square-head clover
Trifolium obtusiflorum	Clammy clover
Trifolium oliganthum	Few-flowered clover
Trifolium repens	White clover
Trifolium striatum	Clover
Trifolium subterraneum	Subterranean clover
Trifolium tomentosum	Woolly clouer
Trifolium variegatum	White-tipped clover
Trifolium willdenovii	Tomcat clover
Trilliam albidum	Wake robin
Trillium chloropetalum	Common trillium
Trillium ovatum	Western wake robin
Triodanis biflora	Venus looking-glass
Triphysaria eriantha ssp. eriantha	Butter-and-eggs, Johnny-tuck
Triphysaria pusilla	Dwarf owl's-clover
Triphysaria versicolor ssp. faucibarbata	Smooth owl's cover
Trisetum canescens	Tall trisetum

Plant List for Sugarloaf Ridge State Park General Plan Study Area (cont.)

SCIENTIFIC NAME	COMMON NAME
Triteleia hyacinthina	White brodiaea
Triteleia laxa	Ithuriel's Spear
Triteleia lugens	Coast Range triteleia
Triticum aestivum	Wheat
Typha domingensis	Cattail
Umbellularia californica	California Bay
Uropappus lindleyi	Lindley's silverpuff
Urtica dioica	Stinging nettle
Urtica dioica ssp. gracilis	California Stinging Nettle
Urtica dioica ssp. holosericea	Hoary nettle, Stinging nettle
Vaccinium ovatum	California huckleberry
Verbascum thapsus	Mullein
Verbena lasiostachys	Western verbena
Veronica persica	Veronica, Speedwell
Vicia americana var. americana	American vetch
Vicia dasycarpa	Vetch
Vicia gigantea	Giant vetch
Vicia lathyroides	Spring vetch
Vicia lutea	Yellow vetch
Vicia sativa ssp. sativa	Narrow-leaved vetch
Vicia villosa	Hairy vetch
Vicia villosa ssp. varia	Vetch
Vinca major	Greater periwinkle
Viola lobata	Pine violet
Viola ocellata	Western heart's ease
Vitus californica	California Wild Grape
Vulpia bromoides	Brome vulpia, Six-week fescue
Vulpia microstachys	Small fescue
Vulpia myuros var. hirsuta	Rattail fescue
Whipplea modesta	Yerba de selva
Woodwardia fimbriata	Western Chain Fern
Wyethia angustifolia	Narrow-leaf mule ears
Wyethia glabra	Mule ears
Xerophyllum tenax	Indian basket grass, Bear grass
Zigadenus fremontii	Star lily, Fremont's death camas
Zigadenus micranthus	Small-flowered zygadene

Sources: Bowcutt, F.S. 1994; Bowcutt, F.S. 1999; Carroll, A. 2001; Dean, E. 1999; McBride, J.R. and S.J. Barnhart. Undated; Stocking, K. Undated; Warner. P.J. 2001.; Wright, K.E. 1975.

Appendix B: Master Response F from Sonoma Country Inn Final EIR

Master Response F -- Cumulative Traffic Volumes

Several commentors stated that the list of cumulative projects in the Draft EIR was not complete (see also Master Response E). The concern expressed by commentors was that the Draft EIR understates cumulative impacts because this list of projects was not complete. This master response discusses the method used in the Draft EIR to predict future traffic and provides additional analysis of cumulative impacts using an expanded project list.

CEQA REQUIREMENTS

The *State CEQA Guidelines* do not specify the method of determining cumulative traffic volumes: however in practice they are generally derived from:

- a local or regional traffic model,
- a list of cumulative projects; or
- a projection based on historical growth in traffic; or
- a combination of the above.

There is no local or regional traffic model that is suitable for preparing the cumulative traffic volumes needed for this EIR. Sonoma County is presently updating its county-wide traffic model as part of an update to the General Plan. When that update is complete, the county-wide traffic model will be suitable for use in EIRs. However, the model is not yet available for this use.

A list of cumulative projects was developed for the Draft EIR (see pages 2.0-35 and 36 and Master Response E). This list was used to predict special event traffic, and the Draft EIR used the list to develop a worst-case scenario for cumulative special event traffic. However, the list was not considered useful for predicting year 2012 traffic. The County has accurate information only for near-term projects; specifically those projects for which applications have been submitted. Consequently, traffic projections made using a list of projects would be accurate for only a few years into the future. To make traffic projections for 2012 using the project list method, it would be necessary to speculate on the location and traffic generation characteristics of future projects. For this reason, the project list approach was not considered a suitable means of predicting year 2012 traffic for this project.

Instead, the Draft EIR used the traffic growth over the last ten years to predict the growth for the next ten years. This approach is appropriate for this project because growth in the recent past is likely to be similar to growth in the near future. Traffic growth over the last ten years reflects an increase in ambient traffic resulting from population growth as well as increased traffic resulting from new wineries and special events at wineries. The next ten years are likely to bring additional applications for wineries and special events that are generally similar to those recently approved and currently being considered.

A description of the methodology used in the Draft EIR to predict traffic volumes for the 2005 and 2012 horizon years is given below. Following that is a comparison of the Draft EIR traffic projections with projections made using an expanded project list.

DRAFT EIR TRAFFIC PROJECTIONS

As stated in the Draft EIR, the expected ambient (Base Case) year 2005 and 2012 traffic volumes for each horizon year for each of the three peak traffic hours were developed using recent historical growth rates for traffic along State Route 12 between the north end of Sonoma Valley (near Glen Ellen) and Santa Rosa. Ten years of Caltrans State Route 12 traffic data (1992 - 2002) were reviewed to determine growth rates along the highway. The data included volumes at monitoring stations located on State Route 12 at Los Alamos Road, Adobe Canyon Road, Warm Springs Road, and Arnold Drive. Data was also provided by the County, mostly consisting of 24-hour hose counts conducted for proposed developments with access along State Route 12. Rates were found to vary year to year, season to season, and location to location. Just south of Adobe Road Caltrans counts show a three percent increase per year over the seven years from 1992 to 1999;[11] seasonal comparisons at State Route 12/Arnold Drive (westbound) reveal a Sunday in September being 3.2 percent higher than a Sunday in May, and (eastbound) a Sunday in August being 2.8 percent higher than a Sunday in May. Since some locations showed peak hour growth rates ranging from one percent up to three percent, a conservative three percent per year growth rate was selected for the near-term (2005) horizon year. This growth rate would include non-special event traffic from all new housing, wineries and facilities planned along State Route 12 as well as regional growth in tourist traffic (primarily on weekends) and commute traffic (primarily on weekdays). As stated in the Draft EIR, a reduced rate for the ten year projection was considered appropriate because the three percent per year growth rate was found to be high for some sections of the roadway, and considered unlikely to be sustained throughout the study area over the 2002 - 2012 time period. A growth rate of 2.4 percent per year was projected from year 2002 to 2012.

TRAFFIC PROJECTIONS USING A PROJECT LIST

In response to comments on the completeness and adequacy of the cumulative analysis in the Draft EIR, additional analyses have been completed. To determine whether a project list would result in changed traffic levels an expanded cumulative project list was developed that includes the 12 projects identified in the Draft EIR and 16 additional projects identified by commentors (see Master Response E). The expanded list was used to develop traffic projections for2005 and 2012, and the new projections were compared to the projections in the Draft EIR that were based on historical traffic growth.

Exhibit 9-8 shows the Friday PM peak hour trip generation for the expanded project list. The trips were distributed to State Route 12, and the resultant Friday PM peak hour volumes are shown in Exhibits 9-9 and 9-10. For purposes of comparison, the volumes used in the Draft EIR are also shown on these exhibits. Comparing the new cumulative traffic volumes with the corresponding Draft EIR volumes, it can be seen that in all cases the Draft EIR predicted higher volumes on State Route 12. For example, Exhibit 9-9 shows that the Draft EIR traffic projections for 2005 were from eight percent to 36 percent higher in the vicinity of the project; Exhibit 9-10 shows the Draft EIR projections for 2012 to be substantially (in some cases over 100 percent) higher.

The Draft EIR predictions for most of the side roads were generally similar to the projections made using the list method, except at the intersections with Pythian and Adobe Canyon.

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[11] Caltrans count data were provided to the EIR consultants at this count station for a seven year period (not ten years).

EXHIBIT 9-8
FRIDAY PM COMMUTE PEAK HOUR PROJECT TRIP GENERATION FOR YEARS 2005 and 2012 PLANNING HORIZONS FOR EXPANDED CUMULATIVE PROJECT LIST

Project	Notes	Size	PM Peak Hour Trips			
			Inbound		Outbound	
			Rate	Volume	Rate	Volume
YEAR 2005						
Stone Gate Subdivision	Trip Generation Source: ITE *Trip Generation*, 1997	8 SF Residences	.65	5	.36	3
Ledson Winery and Event Center	Existing facility NO NEW TRIPS			-		-
Community School	Replacement of Existing School - NO NEW TRIPS			-		-
Hood Mountain Park Plan	estimates of visitor use			2		6
Hood Mansion Restoration	estimates of visitor use			2		6
Kenwood Wedding Center	Existing facility NO NEW TRIPS			-		-
Darius Anderson Subdivision	Trip Generation Source: ITE *Trip Generation*, 1997	3 SF homes	.65	2	.36	1

EXHIBIT 9-8 (continued)
FRIDAY PM COMMUTE PEAK HOUR PROJECT TRIP GENERATION FOR YEARS 2005 and 2012 PLANNING HORIZONS FOR EXPANDED CUMULATIVE PROJECT LIST

Deerfield Ranch Winery	Source: traffic study on file at Sonoma County	New 45,000 case winery &20 special events per year source: traffic study on file at Sonoma County	*	2	*	26
Mayo Winery	Source: traffic study on file at Sonoma County		*	0	*	9
Chauvet Hotel Site	Source: ITE *Trip Generation*, 1997	6 new condominiums	.36	2	.18	1
Glen Ellen Inn	Expansion from two rooms to six rooms Source: ITE *Trip Generation*, 1997	4 new rooms	.32	1	.29	1
Gaige House Inn	Expansion from 15 to 23 units Source: ITE *Trip Generation*, 1997	8 new rooms	.32	3	.29	1
Juvenile Justice Center	Source: Initial Study with traffic data	expansion of existing facility	*	0	*	15
Valley of the Moon Children's Home	Source: Initial Study with traffic data	expansion of existing facility	*	11	*	34
Orchards at Oakmont Subdivision	new senior subdivision	165 senior units	.15	25	.12	20

EXHIBIT 9-8 (continued)
FRIDAY PM COMMUTE PEAK HOUR PROJECT TRIP GENERATION FOR YEARS 2005 and 2012 PLANNING HORIZONS FOR EXPANDED CUMULATIVE PROJECT LIST

Annadel Vineyards	new winery no retail on-site	New winery 50,000 cases	*	12	*	20
Mobius Painter Winery	Source: Initial Study with traffic data	New winery 150,000 cases tours, tasting, sales 10 AM to 4 PM weekdays	*	11	*	18
Landmark Winery	winery expansion Source of Trip Generation data: interview with owner/operator	expand from __ cases to 35,000 cases per year		1		2
Blackstone Winery (former St Francis)	winery expansion and events application winery expansion Source of Trip Generation data: interview with owner/operator	expand from 14,000 cases to 125,000 cases per year plus special events		1		2
St Francis Winery & Vineyards	events application only			-		-

EXHIBIT 9-8 (continued)
FRIDAY PM COMMUTE PEAK HOUR PROJECT TRIP GENERATION FOR YEARS 2005 and 2012 PLANNING HORIZONS FOR EXPANDED CUMULATIVE PROJECT LIST

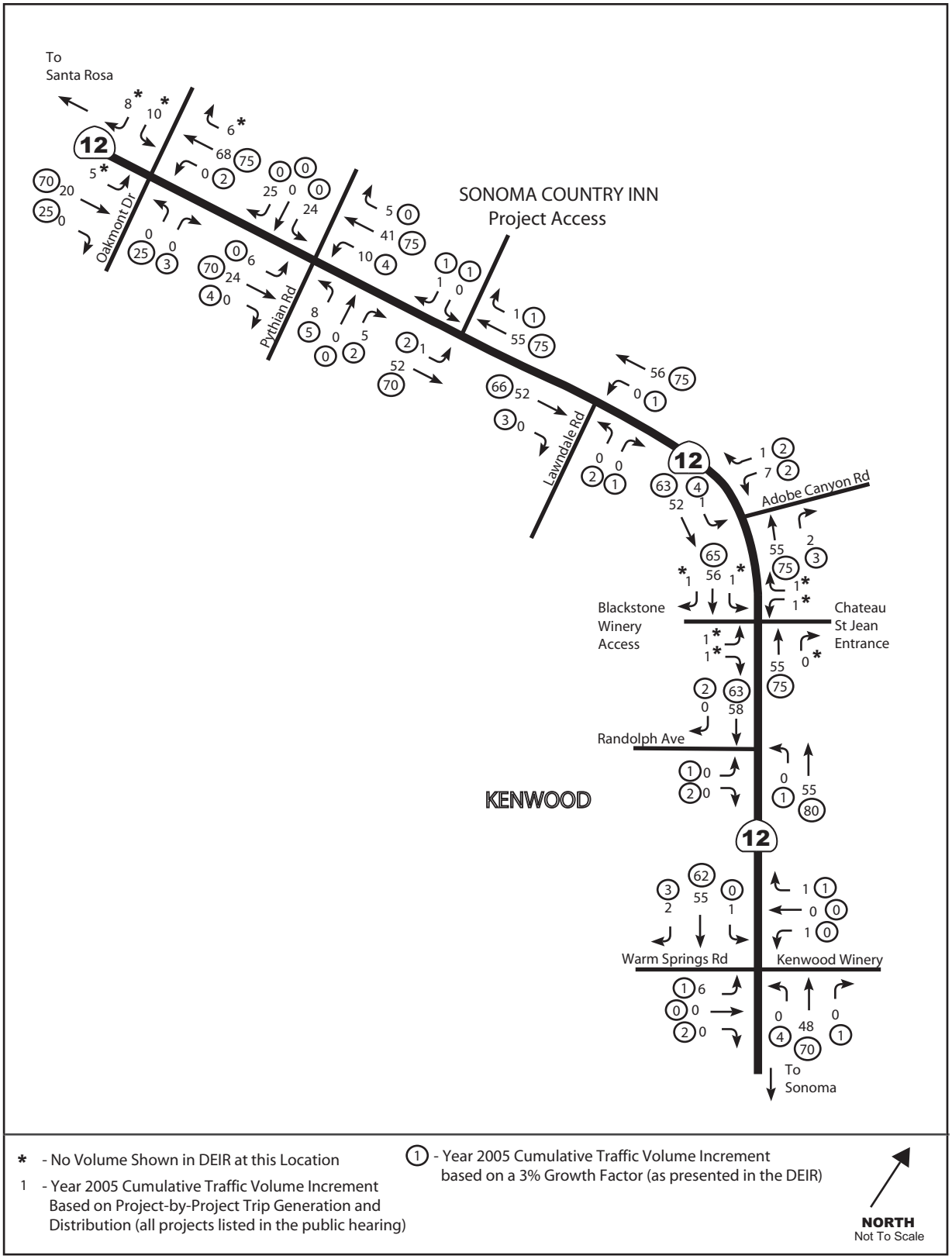
Chateau St. Jean Winery Expansion	winery expansion and events application winery expansion Source of Trip Generation data: interview with owner/operator	expand from 250,000 cases to 750,000 cases per year plus special events		1		2
Korbel (Kenwood Winery)	winery expansion Source of Trip Generation data: interview with owner/operator	expand from 125,000 cases to 500,000 cases per year		1		2
Kenwood Inn Expansion	Traffic Study on file with County	24 new units	*	8	*	7
Graywood Ranch Subdivision	Trip Generation Source: ITE *Trip Generation*, 1997	3 SF units	.65	2	.36	1
Total Year 2005				**92**		**177**

EXHIBIT 9-8 (continued)
FRIDAY PM COMMUTE PEAK HOUR PROJECT TRIP GENERATION FOR YEARS 2005 and 2012 PLANNING HORIZONS FOR EXPANDED CUMULATIVE PROJECT LIST

YEAR 2012						
Wolf House Hotel	Trip Generation Source: ITE *Trip Generation*, 1997		.32	21	.29	19
Sugarloaf Ridge State Park General Plan	estimated trips based upon Initial Study for State Parks (in progress)			2		6
Las Ventanas Sonoma	estimates of visitor use	98 room resort, spa, 180 seat restaurant	*	55	*	36
Total Year 2012				**78**		**61**

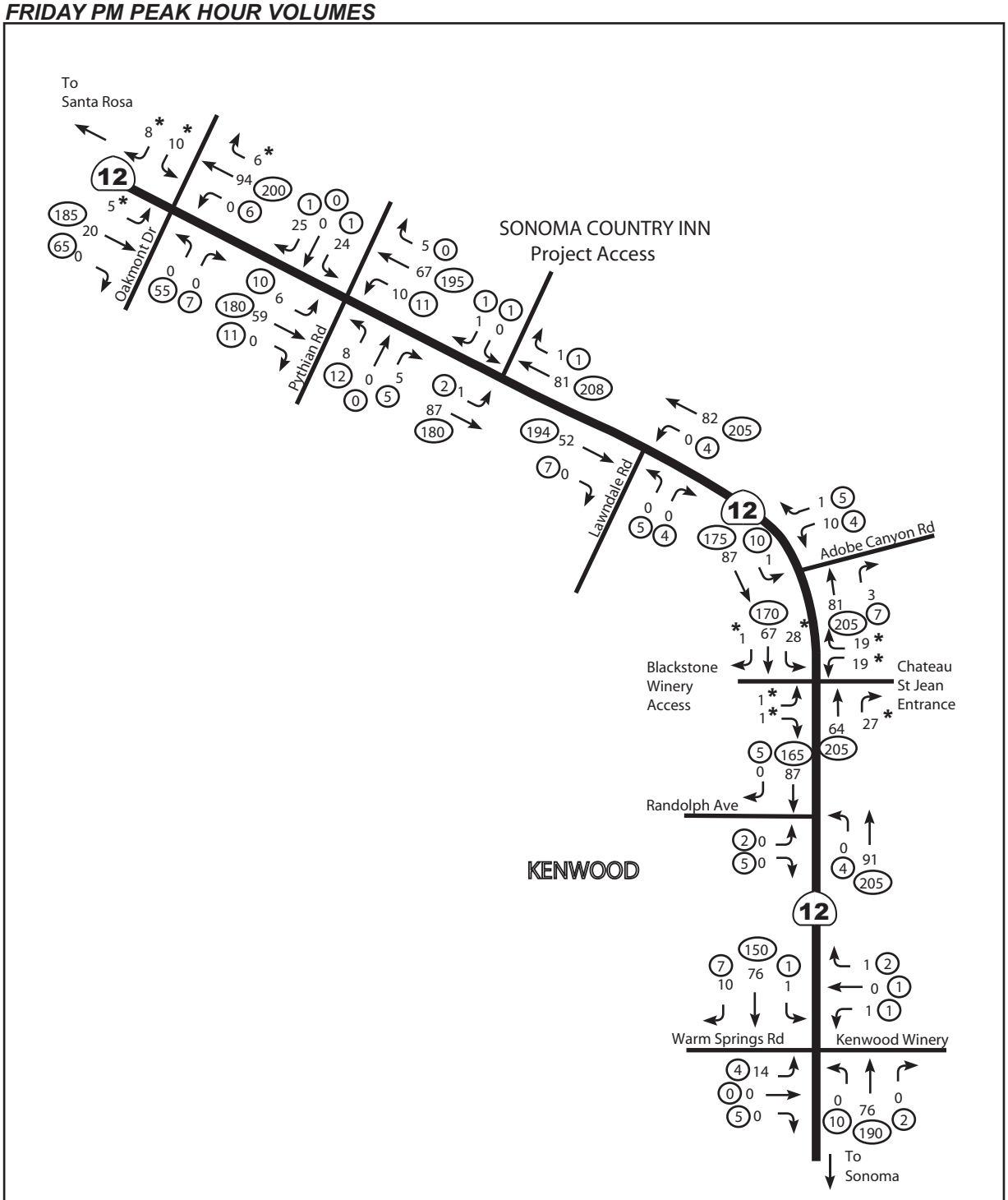
* Trip Generation based upon traffic study on file with Sonoma County PRMD
Project List Source: County of Sonoma PRMD
Trip Rate Source: Trip Generation, 6th Edition by the Institute of Transportation Engineers, 1997, or as noted.
Compiled by: Crane Transportation Group

EXHIBIT 9-9
YEAR 2005 CUMULATIVE TRAFFIC VOLUME INCREMENT DETERMINED ON A PROJECT-BY-PROJECT BASIS FOR EXPANDED CUMULATIVE PROJECT LIST COMPARED TO DEIR FRIDAY PM PEAK HOUR VOLUMES



Source: Crane Transportation Group

EXHIBIT 9-10
YEAR 2012 CUMULATIVE TRAFFIC VOLUME INCREMENT DETERMINED ON A PROJECT-BY-PROJECT BASIS FOR EXPANDED CUMULATIVE PROJECT LIST COMPARED TO DEIR FRIDAY PM PEAK HOUR VOLUMES



Source: Crane Transportation Group

Pythian Road The Draft EIR projections for traffic entering and exiting Pythian Road from State Route 12 are lower than the projections using the expanded project list. The Valley of the Moon Children's Home, the Juvenile Justice Center, and the increased number of units in the Orchards at Oakmont subdivision will generate more traffic than the amount predicted by the percentage increase method used in the Draft EIR. The level of service calculations for this intersection have been done again using the new projections. Exhibit 9-11 provides a comparison between years 2005 and 2012 with base case volumes determined by use of a growth rate (as presented in the Draft EIR) and on a project-by-project basis. As shown in Exhibit 9-11, with either method of determining future base case traffic volumes, the intersection level of service would remain acceptable (at or better than LOS B) for all analyzed time periods. Accordingly, the Draft EIR's conclusions about the Pythian intersection are not affected by the revised calculations. The intersection, which is already signalized, will continue to operate at an acceptable level of service with or without the project.

Adobe Canyon Road The Draft EIR projections for year 2012 traffic entering and exiting Adobe Canyon Road from State Route 12 are too low because the proposed expansion of Sugarloaf State Park will generate more traffic than the amount predicted by the percentage increase method used in the Draft EIR. The level of service calculations have been done again using the new projections and recalculated consistent with modeling assumptions described in Response to Comment 9-1. Exhibit 9-11 provides a comparison between years 2005 and 2012 with base case volumes determined by use of a growth rate (as presented in the Draft EIR) and on a project-by-project basis. As shown in Exhibit 9-11 for Friday PM peak hour, with either method of determining future traffic volumes the intersection level of service remains acceptable (at or better than LOS D). Based on Caltrans staff communications with PRMD staff, it is concluded that the Draft EIR overstated impacts at this intersection. See Response to Comment 9-1 for a discussion of the revised impacts at this intersection.

The new projections for the Pythian Road and Adobe Canyon Road intersections have no effect on other traffic impacts described in the Draft EIR. As noted above, the Draft EIR traffic projections for State Route 12 were in all cases higher than the projections that would result from the project list method. The percentage increase method used in the Draft EIR is a conservative approach, and, with the exception of the two intersections noted above, is more likely to overstate impacts than it is to understate them. No other changes to the impact analysis are necessary to account for cumulative traffic.

TRAFFIC VOLUMES WITH SPECIAL EVENTS

The EIR traffic analysis evaluated State Route 12 roadway and intersection operating conditions during the Sunday afternoon peak traffic hour should average size special events be scheduled at Sonoma Country Inn and all other nearby existing or proposed wineries or facilities (as allowed by use permit). This is a *very conservative* approach to analysis, as it is unlikely that *all* facilities having permits or currently requesting permits for special events would do so concurrently (i.e., same time of day on a Sunday). The analysis further assumed peak inbound and outbound traffic flow would occur at the same time for each facility (also a deliberately *very conservative* assumption), then overlaid these flows on a system operating at a *peak time period* on a weekend. [12] Determination of event size was provided through extensive research and interview efforts by County staff (i.e., file searches for

[12] Analysis was conducted for Sunday afternoon event conditions only with all facilities assumed to have peak inbound flows from 11:30 AM to 12:30 PM and peak outbound flows from 3:30 to 4:30 PM.

EXHIBIT 9-11
REVISED INTERSECTION LEVEL OF SERVICE FRIDAY 5:00 – 6:00 PM – PYTHIAN ROAD/SR12 and ADOBE CANYON ROAD/SR12

Intersection	Existing (Summer 2002)	Year 2005			Year 2012		
		Base Case	Base Case + Project (w/o Special Event)	Base Case + Project +Project Average Size Special Event	Base Case	Base Case + Project (w/o Special Event)	Base Case + Project +Project Average Size Special Event
SR 12/Pythian Rd.	A-5.7 [a]	A-6.3 [b] A-7.6 [c]	A-6.4 A-7.8	A-6.5 A-7.9	A-7.6 A-8.4	A-7.8 A-8.6	A-8.0 A-8.8
SR 12/Adobe Canyon Rd	C-23.7/B-10.4[d]	D-25.5/B-10.7[e] D-25.9/B-10.7[f]	C-25.9/B-10.8 D-26.3/B-10.7	D-26.0/B-10.8 D-26.5/B-10.8	D-29.9/B-11.5 D-30.3/B-11.3	D-30.5/B-11.6 D-30.8/B-11.4	D-30.7/B-11.6 D-30.9/B-11.4

[a] Signalized level of service– control delay (in seconds).

[b] Signalized level of service– control delay (in seconds). Base Case determined on a project-by-project basis (see Master Response F).

[c] Signalized level of service– control delay (in seconds). Base Case determined by growth rate, with volumes added at Pythian Road due to additional cumulative projects (see Master Response F).

[d] Side street stop sign controlled level of service–average control delay (in seconds). SR 12 eastbound left turn to Adobe Canyon Road/ Adobe Canyon Road southbound left turn to SR 12.

[e] Side street stop sign controlled level of service–average control delay (in seconds). SR 12 eastbound left turn to Adobe Canyon Road/ Adobe Canyon Road southbound left turn to SR 12. Base Case determined on a project-by-project basis (see Master Response F).

[f] Side street stop sign controlled level of service–average control delay (in seconds). SR 12 eastbound left turn to Adobe Canyon Road/ Adobe Canyon Road southbound left turn to SR 12. Base Case determined by growth rate, with volumes added at Pythian Road due to additional cumulative projects (see Master Response F).

Sources: Year 2000 Highway Capacity Manual Operations Methodology & Crane Transportation Group

permitted size of event and interviews with operators of facilities having permits or applying for permits to hold special events).

Based upon information provided by County staff, existing, approved or proposed facilities were identified near Sonoma Country Inn that could have special events. They included the Sonoma Flower Company, proposed new Mobius Painter Winery, Ledson Winery, St. Francis Winery, Sonoma Country Inn (Project), Landmark Winery, Chateau St. Jean Winery, Blackstone Winery (formerly St Francis Winery), Las Ventanas Resort, Korbel (Kenwood Winery). The only additional event traffic that would be associated with the expanded project list would be associated with the Deerfield Winery. The Draft EIR already identifies significant impacts from cumulative events. Re-analysis with an additional event would increase traffic volumes along SR 12 but would not result in identification of new impacts or change the language of the mitigation measure provided in the Draft EIR. As stated above, the analysis presented in the Draft EIR was very conservative, assuming that all events would occur on the same day and release their traffic during the same hour. Adding more events (such as traffic exiting the Deerfield Winery) would not result in identification of new impacts and would only add to the already very conservative analysis.

Appendix C: Excerpt from Response to Comment 9.1 from Sonoma Country Inn FEIR

Note: Previous Appendix B references Response to Comment 9.1.
Attached is that reference.

EXCERPT FROM RESPONSE TO COMMENT 9.1 FROM SONOMA COUNTRY INN FEIR

The following describes the change in level of service analysis methodology shown for Adobe Canyon Road in the Sonoma Country Inn FEIR as part of its Response to Comment 9-1:

The Sonoma Country Inn Draft EIR used a conservative approach to analysis of Adobe Canyon Road and did not consider the use of the SR 12 refuge lane on the westbound approach to Adobe Canyon Road by vehicles turning left from Adobe Canyon Road. This decision was based on the EIR traffic analyst's observations that few motorists at this intersection use the lane as a refuge, because high-speed through traffic on SR 12 can be daunting to turn into. The available center turn lane was observed to be used by eastbound SR 12 traffic when making left turns, but was rarely observed to be used as a left turn refuge lane for making two-part turns from Adobe Canyon Road. Field study of the frequency of use of the center lane as a left turn refuge revealed that during the PM peak hour of the day observed, approximately 25 percent of left-turners use the lane in this manner.[1] In the opinion of the EIR preparers, this would not recommend use of the modeling software to assume the refuge as a major factor in reducing delays for left turns at this location. Seventy-five percent of left-turners during the PM peak hour would not benefit from this reduction in turning delay during the PM peak hour. In summary, the EIR analysts determine that delays experienced for left turners at the Adobe Canyon Road intersection during the heaviest traffic on weekdays and Sundays can be very lengthy, and are more accurately depicted by use of the modeling software reported in the DEIR, with no credit given for use of the center lane as a left-turn refuge. For these reasons, the EIR analysts presented the level of service results as shown in the Sonoma Country Inn EIR.

The County of Sonoma PRMD requested Caltrans to provide guidance regarding the appropriate assumptions to make at the intersection. Caltrans engineers concluded that it is acceptable to model the Adobe Canyon Road intersection with the refuge lane (personal communication, Maija Cottle, California Department of Transportation, October 20, 2003).

Based on Caltrans communications with County staff, analysis of the Adobe Canyon Road intersection was revised to account for the use of the center turn lane as a refuge. Sonoma Country Inn Draft EIR Exhibits 5.2-6. 5.2-7, 5.2-8, 5.2-33, and 5.2-34 were revised consistent with text changes. The resulting level of service at the SR 12/Adobe Canyon Road intersection is far better than presented in the Sonoma County Inn DEIR for all time periods analyzed. For example, rather than the left turning movement being considered to operate at LOS F (existing 2002 PM peak hour conditions), indicating lengthy delays for this turning movement, it would be considered to operate at LOS C (existing conditions), and at LOS D or E (by year 2012).

An additional revision to the Sonoma Country Inn Draft EIR was necessary due to an oversight on the part of the EIR analysts: the SR 12/Adobe Canyon Road intersection just meets the Caltrans rural peak hour signal warrant during the existing (year 2002) Sunday PM peak hour, having an approach volume of 75 vehicles (the minimum approach volume required to meet the peak hour rural signal warrant).

[1]Telephone conversation with Dalene Whitlock, W-Trans, September 16, 2003.

Due to the changed intersection analysis (i.e., credit given for use of the center turn lane as a refuge lane, per Caltrans' direction) and the peak hour signal warrant being met under existing conditions, the text of the Sonoma Country Inn Draft EIR was changed.

Consistent with this changed analysis for the Sonoma Country Inn DEIR, the Sugarloaf Ridge State Park Preliminary General Plan and EIR analyzed the intersection using both methodologies (i.e., both with and without credit for use of the S.R. 12 center turn lane as a refuge for left turns from Adobe Canyon Road). If the refuge lane is taken into account, then under 2005 Base Case conditions at the State Route 12/Adobe Canyon Road intersection, the stop sign controlled Adobe Canyon Road westbound left turn to State Route 12 would operate at LOS D during the Sunday PM peak hour. Under 2012 Base Case conditions at the State Route 12/Adobe Canyon Road intersection, the stop sign controlled Adobe Canyon Road westbound left turn to State Route 12 would operate at LOS E during the Sunday PM peak hour. The increment of project traffic would result in over 5 seconds added delay (i.e., the project would exceed the County's "5-second" impact threshold for intersections operating unacceptably [LOS E or worse]). Because the Preliminary General Plan includes Guideline CIRC-3, which directs the Department to conduct appropriate CEQA environmental review for area-specific projects and pay a fair share contribution to needed intersection improvements warranted by each project, this impact would not be considered to be significant.

In summary, if analyzed without credit for use of the refuge lane conditions (as analyzed in the DEIR), project-generated volumes would be expected to result in significant impacts during both 2005 and 2012 Sunday PM peak hour conditions. If credit is given for use of the refuge lane, project-generated volumes would be expected to result in significant impacts only during 2012 Sunday PM peak hour conditions.